

City of Dalton, Georgia

Analysis of Impediments to Fair Housing Choice

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Table of Contents

1 Executive Summary	III
2 Introduction.....	10
3 Definitions & Data Sources	12
4 Limitations of this Analysis	16
5 Historical Overview of City of Dalton.....	20
6 Demographics.....	21
7 Economic Analysis.....	27
8 Home Mortgage Data Act (HMDA) Analysis.....	32
9 Fair Housing Complaints	41
10 Fair Housing Education.....	44
11 Affordable Housing Snapshot.....	47
12 Infrastructure	55
13 Land Use & Zoning	58
14 Current Impediments and Recommendations	65
15 Conclusion	67
Appendix.....	68

1 Executive Summary

Each year, the U.S. Department of Housing and Urban Development (HUD) requires Community Development Block Grant (CDBG) entitlement grantees, such as The City of Dalton, to submit a certification that they will affirmatively further fair housing, and that their grants will be administered in compliance with Title VI of the Civil Rights Act of 1968 and the Fair Housing Act as amended in 1988, which prohibit discrimination in all aspects of housing, including the sale, rental, lease or negotiation for real property.

Local entitlement communities meet this obligation by performing an “Analysis of Impediments to Fair Housing Choice” (AI) within their communities and developing and implementing strategies and actions to overcome any impediments to fair housing choice based on their history, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, to include Protected Classes, as well as provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities. City of Dalton staff worked together with WFN Consulting to perform this analysis.

Historical Overview

Dalton, the carpet capital of the world, is located eighty miles north of Atlanta and thirty miles south of Chattanooga, Tennessee, in the valley and ridge region of northwest Georgia. The Cherokee Indians inhabited northwest Georgia long before Europeans settled in the region, and over time they were forced to move as a part of the tragic event, known as the Trail of Tears. About the same time, in 1837, a small village named Cross Plains, which would become Dalton, came into existence as a trade junction crossroads.

In 1895, the colonial practice of tufting was revived and started Dalton’s long history of carpet production. This skill enabled people in this area to survive the great depression. After World War II, the development of yardage machines, which could make tighter rows and wider widths, refocused the industry toward the production of carpets and rugs. Today, the major companies in Dalton are Shaw Industries, Inc., Mohawk Industries, Inc., Beaulieu of America, Inc., and J & J Industries, Inc.

Demographics

According to the 2012 Decennial Census, Dalton had a total population of 33,413 living in 13,378 households. The City’s racial makeup consisted of 65.0% White, 6.4% Black or African American, 2.4% Asian, 0.6% Native American, 0.1% Pacific Islander, 22.2% identified as some other race, and 3.2% of the population that identified as belonging to two or more races. The City’s ethnic makeup consisted of 48.0% of the populations identifying as Hispanic or Latino of any race. In 2012, the median household income in the Dalton was \$35,991, and the median income for a family was \$41,442. The per capita income for the city was \$20,632.

Protected Class Analysis

Historically, the non-Hispanic White population has been the majority in Dalton. Over the past 10 years, the percentage of non-Hispanic White population has decreased by about 1.2% from 66.2% 2000 to 65% in 2010. The Black/African American share of the total population also decreased in Dalton from 2000-2010 making up 7.7% in 2000 and 6.4% in 2010. There was also a significant increase in the Hispanic/Latino population during the same period. According to the 2000 Census data, Hispanic/Latinos made up 40% of the total population and increased to 48.2% in the 2010 Census. The reader should be aware that the definitions and classifications used from one decennial census to the next are subject to change. The sharp increase in population falling into the "Other Population/Two or More Races" category is indicative of such a change in the Census itself and should not be interpreted strictly as a surge in this population group.

Economic Analysis

According to the 2010 Census, the median family income in Dalton was \$45,682 and the median household income was \$38,231. Males had median earnings of \$28,158 compared to \$23,701 in median earnings for females. By comparison, the median family income in 2010 was 11.1% higher than its level in the year 2000 at \$41,111. As compared to the median household income in 2000 which was \$34,312, reflecting 11.4% increase in income.

In 2010, the per capita income for Dalton was \$21,430. Comparatively, the per capita income in 2000 was \$20,575. While not unaffected by the economic downturn of the last several years, the impact on the City's families and households appears, at least through Census figures, to have been minimal.

The unemployment rate in Dalton has more than doubled from 2007 to 2009 as job growth slowed and the economy fell into recession. Unemployment reached its highest point at 13.6% in 2011, but the unemployment rate remained stable at 12.5% annually for both years, almost 33% higher than the national rate of 9.3%. The unemployment rate in 2013 was over 12% in July, but ended the year slightly over 9.0%.

Public Schools

For the 2012-2013 school year, 7,225 students (ages 3-12th grade) attended public schools within the City of Dalton Public School District. The Dalton Public School District is composed of 9 schools; 6 elementary schools, 1 middle school, and 2 high schools. The Georgia AYP Summary 2011, which is the most recent data available, reported that all 9 schools in the district are classified as Title I schools. A Title 1 schools is defined as a school that meets the criteria to receive federal funds due to having a high percentage of low-income students who are at risk of not meeting their state's academic standards. When a Title 1 school fails to meet AYP goals after five consecutive years, a plan must be prepared to restructure the school. The plan must include one of the following: reopen the school as a public charter school; replace all or most of the school staff; enter into a contract for a private company to operate the school or arrange for the state to take over operation of the school. ¹

¹ *No Child Left Behind: A Parent's Guide*. US Department of Education, June 2003: 8-9. Web. 18, September 2012.

Home Mortgage Data Act (HMDA) Analysis

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions with offices in metropolitan areas to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market. As promulgated by rules, these lenders must disclose the number of loan applications by census tract, and by the income, race, and gender of the applicant and co-applicant.

Between 2007 through 2011, the City of Dalton had experienced a steady decline in its housing market, as evidenced by the consistently decreasing number of conventional home purchase loan originations. In 2007, 269 of home loans were originated in Dalton which is a slight decrease when compared to 2008 in which only 200 home loans were originated. Comparatively, in 2009 Dalton had a total of 230 loans originated and 218 in 2010 with the most significant loan origination decrease in 2011 with only 197 loans originated. The median loan amount in 2011 was \$107,000.

HMDA is essential in understanding the mortgage climate in the City of Dalton, although the data does have limitations. It does not take into consideration how the loan decisions were made (i.e. credit worthiness) nor is a lender required to report the race, sex, and income data for loans that they purchase from other institutions (i.e. mortgage brokers). These and other issues must be taken into consideration when reaching assumptions about the findings. The data does provide information about possible trends in the City's mortgage climate. The 2011 HMDA data clearly shows a trend with respect to the low numbers of Black applicants and low- and moderate-income applicants; as well as the high levels of denials of loans to Black and low income applicants.

This Dalton HMDA analysis reflects significant differences in loan approvals and denials due to race and ethnicity. However, based on the data alone, it was not possible to determine if the lender motivation for this disparate treatment was due to economic reasons or social discrimination or both.

Fair Housing Complaints

Households in the City of Dalton may file their fair housing complaints at Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. The mission of the FHEO is to protect individuals from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence.

From January 1, 2003 through May 31, 2013 there were 24 housing complaints filed in Dalton. Of these complaints, seven were determined to have cause and four of the complaints were settled through conciliation with one complaint being awarding a total settlement amount of \$10,000.

Only one of the “with cause” complaints was withdrawn after resolution. As of August 31, 2012, all 24 FHEO complaints have been closed.

Fair Housing Education

Public awareness of fair housing issues and laws ensures that citizens know their rights and what to do if their rights have been violated. In general, fair housing services can typically include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Services can also include providing landlord/tenant counseling that educates landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislation as well as mediating disputes between tenants and landlords.

Based on the responses derived from the Fair Housing Survey conducted in conjunction with this Analysis, 35 out of 36 [97.2%] of survey respondents stated they had never experienced housing discrimination. While 1 [2.8%] of respondents reported that they had experienced housing discrimination.

Affordable Housing Snapshot

Housing affordability is a significant factor for residents attempting to select housing that meets their family needs. HUD considers housing affordable if it costs less than 30% of a family's income². Households that spend over that threshold tend to lack affordable housing and may be significantly cost burdened and may have difficulty affording basic necessities.

As of the 2011 American Community Survey, Dalton has a total of 13,532 housing units, of which 14.3% were vacant. Much of the housing stock in Dalton has aged, as evidenced by the 65% of units built prior to 1990. The most common type of housing in the City is single-family detached units. Of the total housing units, 6,376 [47.1%] were single-family detached units, while 6,138 [45.5%] were multi-family units. According to the 2011 ACS Estimates, Dalton has a considerably smaller portion of mobile homes which is comprised of 1.3% of the total housing units for the City.

The median value for a home in Dalton was \$141,000, which is considered affordable for low to moderate-income households. 19.4% of the homes ranged between \$50,000 and \$99,999. The greatest number of homes (29.4%) fell within a range of \$100,000 to \$149,999. Housing costs have continued to increase due to the recent population increases. A little over 32.1% of all homes within the City cost over \$150,000 and \$299,999.

According to 2011 ACS Estimates, the City has 34% of owners spending more than 30% of their annual household income on housing-related costs, while the City only has 9.5% of owners who have housing costs ranging from 25% - 29.9%. The increased percentage in 30% and above category may be correlated to the recent economic shift in the housing market.

² U.S. Department of Housing and Urban Development, <http://www.hud.gov/offices/cpd/affordablehousing/index.cfm>

Infrastructure

Public transportation can play a significant role in increasing access to the supply of affordable housing to groups in need and others protected under fair housing laws. But if public transportation from a lower cost neighborhood is inefficient in providing access to employment centers, that neighborhood becomes inaccessible to those without dependable means of transportation, particularly very low-income residents, the elderly, and persons with disabilities.

The City of Dalton is comprised of 19.84 square miles. As of 2011, 81.6% of Dalton residents commute to work driving alone using a car, truck, or van. This compares to only 13% who carpool; .001% using public transportation; 1.3% walk; and 1.7% who work from home.

The City of Dalton does not currently have its own public transportation service. However, Whitfield County operates and maintains a public transit service. The Whitfield County transit service operates 11 routes throughout the County and the City of Dalton. Whitfield County's transit rate is \$4.00 for each one-way trip. The transit service runs Monday –Friday from 6:30 a.m. until 6:00 p.m. with the last call back pickup at 4:30 p.m.

Land Use & Zoning

While private actions principally influence the housing market, regulations at the federal, state, and local levels significantly impact the market's ability to provide affordable housing units. The cost of housing and the incentives to develop, maintain, or improve affordable housing in Dalton are directly related. Although many barriers to affordable housing are beyond governmental control, several factors affecting housing costs can be identified at the municipal level. These factors can include zoning ordinances and land use controls. A review of the City of Dalton's comprehensive planning and zoning ordinances can assist the City to identify potential impediments to fair housing choice.

Comprehensive planning is a critical means by which governments address the interconnection and complexity of their respective jurisdictions. The interconnectedness of land uses means that a decision as to the use of a particular piece of property has consequences not only for surrounding property, but for a myriad of other issues as well. Successful comprehensive planning efforts can impact the community and inspire positive changes in a community for the future.

The Dalton Zoning Ordinance makes no specific provisions for temporary housing/shelters or transitional housing uses in the City. There is a provision allowing rooming/boarding houses with the conditions that the owner/operator to live on-site. This type of use is a permitted use in the R-3 Zoning District within the City.

The City's zoning code is not unreasonably restrictive on lot minimums and provides for relatively small minimum lot sizes across residential zoning districts. Zones for multi-family and other attached dwellings are present and have maximum building heights conducive to development of a variety of housing options. With only the R-1 and R-1A Zoning Districts prohibiting residential uses other than single-family detached structures, the ability to provide affordable housing throughout the residential areas of the City appears to be adequate.

However, the definition of "family" used by the Dalton Zoning Ordinance may be interpreted to restrict the ability of residents to live with roommates or aides, which can impact housing choices particularly for low-income or elderly or disabled residents. Zoning restrictions that effectively prevent large groups of people (the homeless, those recovering from addictions to drugs or alcohol, and those persons under judicial or corrective control) from living in neighborhoods can deprive these individuals of their right to fair housing choice.

Current Impediments and Recommendations

This analysis has revealed barriers to fair housing choice in the City of Dalton. In this section, the overarching impediments identified are summarized with supporting examples noted. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, the related impediment. It should be noted that these impediments are systemic and will require effort from both private sector and public sector actors to correct. The City of Dalton has an important role to play but cannot on its own bring about the change necessary to remove these barriers to fair housing choice.

Impediment #1: Lack of Public Transportation Options

Transportation links are essential components to successful fair housing. The issue at hand regarding transportation and fair housing choice revolves around the ease with which a resident can travel from home to work if he or she lives in a lower income area or an area of minority concentration. Residents who do not have access to commercial areas are limited in where they can shop for goods and services, as well as seek employment. The converse is true as well. Inadequate transportation routes limit the selection of housing to neighborhoods within transportation service areas and disproportionately affect low-income, disabled, and elderly residents.

While, the City of Dalton does not currently have its own public transportation service, Whitfield County operates and maintains a public transit service. The County's transit service operates 11 routes throughout the County and the City of Dalton. Whitfield County's transit rate is \$4.00 for each one-way trip which can be costly for low and moderate-income residents.

Recommendations:

It is imperative the City of Dalton continue to work with the County to routinely review transportation planning efforts to advocate public infrastructure improvements that align with the goal of expanding housing choice. While inherently limited by the amount of funding available, the City can collaborate with local nonprofit agencies to allocate resources transportation programs for elderly, disabled, and low-income residents.

Impediment #2: Lack of Fair Housing Education, Testing and Enforcement Capacity

The City of Dalton does not have any organization solely dedicated to providing fair housing education to residents of the City. Results of the Fair Housing Survey indicate that Dalton residents are not especially knowledgeable of their fair housing rights and many do not know how to file a complaint if they feel their rights have been violated. Of those residents who reported facing housing discrimination yet chose not to file a complaint, the predominant reasoning is that they didn't know what good it would do. While education is needed for the public at-large, focused education is also needed for other targeted groups such as mortgage lenders, real estate agents, developers and building inspectors.

Recommendation:

The City of Dalton should annually reserve a portion of its CDBG public service funds to be awarded as a competitive Fair Housing Grant to an organization that will carry out a comprehensive fair housing testing program in the City. As additional component of the Fair Housing Grant, the successful applicant should launch and sustain a robust public interest ad campaign to increase the public's awareness of housing discrimination and of the process for filing a complaint and increase opportunities for representation of victims of discrimination in the pursuit of legal recourse.

Furthermore, the City of Dalton should sponsor specific education opportunities on Fair Housing Act compliance for landlords, builders, real estate agents, City staff, and the public at large, making periodic training participation mandatory for Departmental staff and entities contracting with the City.

Conclusion

Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified which restrict the housing choice available to residents of in the City of Dalton and further prevent them 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 systemic and will require effort from both private sector and public sector actors to correct. The City of Dalton has an important role to play but cannot on its own bring about the change necessary to remove these barriers to fair housing choice.

The recommendations proposed in this document address impediments relative to lack of public transportation options and the lack of fair housing education, testing, and enforcement capacity. Implementation of the recommendations can assist the City of Dalton in achieving the reality of being an open and inclusive community that truly embraces Fair Housing Choice for all its residents.

2 Introduction

Each year, the U.S. Department of Housing and Urban Development [HUD] requires Community Development Block Grant [CDBG] entitlement grantees, such as the City of Dalton, to submit a certification that they will affirmatively further fair housing, and that their grants will be administered in compliance with Title VI of the Civil Rights Act of 1968 and the Fair Housing Act as amended in 1988, which prohibit discrimination in all aspects of housing, including the sale, rental, lease or negotiation for real property.

Title VIII of the Civil Rights Act of 1968, as amended, commonly known as the Fair Housing Act, prohibits discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability.

Provisions to Affirmatively Further Fair Housing (AFFH) are principal and long-standing components of HUD's housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing³.

Local entitlement communities meet this obligation by performing an "Analysis of Impediments to Fair Housing Choice Plan" (abbreviated "AI") within their communities and by developing and implementing strategies and actions to overcome these barriers based on their history, circumstances, and experiences. In other words, the City of Dalton will define the problems, develop the solutions, and be held accountable for meeting the standards set for itself. This Analysis of Impediments identifies the impediments to fair housing choice in the jurisdiction, assesses current fair housing initiatives, and describes actions the jurisdiction will take to overcome the identified impediments. By taking actions that address the impediments, HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through this process, Dalton promotes fair housing choices for all persons, to include Protected Classes, as well as provides opportunities for racially and ethnically inclusive patterns of housing occupancy, identifies structural and systemic barriers to fair housing choice, and promotes housing that is physically accessible and usable by persons with disabilities.

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) Program grantees to document AFFH actions in the CDBG and Comprehensive Housing Affordability Strategy (CHAS) annual performance reports that are submitted to HUD.

3 Definitions & Data Sources

As defined in *The Fair Housing Planning Guide*, the definition of “Affirmatively Further Fair Housing” [AFFH] requires a grantee to:

- Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
- Take appropriate actions to overcome the effects of any impediments identified through the analysis;
- Maintain records reflecting the analysis and actions taken in this regard⁴.

As described in *The Fair Housing Planning Guide*, the CHAS statute at Section 104(21) defines the term “certification” within the context of the Certification to Affirmatively Further Fair Housing [AFFH] to be:

- A written assertion
- Based on supporting evidence
- Available for inspection by the Secretary, the Inspector General and the public
- Deemed accurate for purposes of this Act unless the Secretary determines otherwise after:
 - Inspecting the evidence
 - Providing due notice and opportunity for comment⁵.

In carrying out its local Analysis of Impediments to Fair Housing Choice, the City of Dalton utilized the following definition of “Fair Housing Choice” as outlined by HUD:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

As defined in *The Fair Housing Planning Guide*, the definitions of impediments to fair housing choice include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin⁶.

In carrying out its local Analysis of Impediments to Fair Housing Choice, the City of Dalton utilized the following definition of Protected Classes:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Dalton does not have a specific definition of “affordable”. The definition used throughout this analysis is congruent with HUD’s definition:

⁴ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume I (Chapter I: Fair Housing Planning Historical Overview, Page 14)*. March 1996.

⁵ Ibid. Page 16.

⁶ Ibid. Page 26.

- The U.S. Department of Housing and Urban Development (HUD) defines "affordable" as housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners' association fees.
- Rental housing affordable to a low-income family of four (income up to 80% of the area median income) residing in the City of Dalton would carry a total monthly cost of up to \$1,386 as noted by the National Low Income Housing Coalition's 2010 Out of Reach Data.

Data Sources Used in This Analysis

Census Data – Data collected by the Decennial Census for 2010, 2000, and 1990 is used in this Analysis (Census 1990 data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- Summary File 1 (SF 1) – This dataset contains what is known as "100% data", meaning that it contains the data collected from every household that participated in the 2010 Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income.
- Summary File 3 (SF 3) – Containing sample data from approximately one in every six US households, this dataset is compiled from respondents who received the "long form" Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value.
- 1990 Census Summary Tape File 1 (STF 1) – Comparable to the 2010 and 2000 SF 1, this dataset contains "100% data" collected from every household that participated in the 1990 Census and is not based on a representative sample of the population. Only basic characteristics such as age, sex, and race are contained in this dataset.
- 1990 Census Summary Tape File 3 (STF 3) – Comparable to the 2000 and 2010 SF 3, this dataset contains sample data from the approximately one in every six US households who received the "long form" Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value.

American Community Survey [ACS] – The American Community Survey is a relatively new component of the Decennial Census program that collects population and housing data every year, thus providing communities with more current data throughout the 10 years between censuses. ACS data is compiled from an annual sample of approximately 3 million addresses. This data is released in two different formats: single-year estimates and multi-year estimates.

- 2011 ACS 1-Year Estimates – Based on data collected between January 2011 and December 2011, these single-year estimates represent the most current information available from the US Census Bureau, however; these estimates are only published for geographic areas with populations of 65,000 or greater.
- 2006-2010 ACS 3-Year Estimates – More current than Census 2000 data and available for more geographic areas than the ACS 1-Year Estimates, this dataset is one of the most frequently used. It contains data collected between January 2007 and December 2009 and is published for geographic areas with populations of 20,000 or greater.

Federal Financial Institutions Examining Council [FFIEC] – The FFIEC collects and publishes certain data used in connection with federal reporting responsibilities under the Home Mortgage Disclosure Act and the Community Reinvestment Act.

- FFIEC 2012 & 2011 Census Reports – Beginning with calendar year 2012, Census Reports are based on 2006-2010 5-year estimate American Community Survey data. The list of MSAs, states, counties, tracts, MSA family incomes, tract family incomes, tract income levels, and income percentages generated using 2006-2010 ACS data is available on the FFIEC website. Census Reports for calendar years 2003-2011 are based on the 2000 Census. While most data fields in the 2011 Reports contain Census 2000 figures, some fields contain more current estimates that are arrived at through data processing by other federal agencies (most notably, a 2012 Estimated Median Family Income both by MSA and by census tract is provided by HUD, using HUD’s own, independent data processes).
- Home Mortgage Disclosure Act [HMDA] Data – Financial institutions subject to the HMDA (including banks, credit unions, and other mortgage lenders) must annually submit certain mortgage loan data to the FFIEC. The FFIEC aggregates and publishes the 2008 and 2009 data. The most current HMDA data used in this Analysis is based on loan records from the 2010 calendar year.

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.

- Dalton Fair Housing Survey – This survey was designed to collect input from a broad spectrum of the community and received responses from Dalton residents and non-residents. The survey consisted of 46 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 47 responses 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 particular question being discussed and may not be a percentage of the full 47 survey respondents.

Stakeholder Interviews – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis. These stakeholders included representatives of non-profit

organizations, municipal officials, fair housing advocates, 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 Meetings - The following information, herein defined as the City of Dalton Analysis of Impediments to Fair Housing Choice, was prepared for the purposes as previously described. Therefore, this report seeks to identify impediments and develop a Fair Housing Action Plan of proposed solutions. Many of the impediments identified in this report will require additional research and on-going analysis by the City of Dalton, local community task forces, or local non-profit organizations. This report does not constitute a comprehensive planning guide; it simply provides analysis as to the current situation and prepares a plan of action to ameliorate existing impediments.

4 Limitations of this Analysis

The following information, herein defined as the City of Dalton Analysis of Impediments to Fair Housing Choice, was prepared for the purposes as previously described. Therefore, this report seeks to identify impediments and develop a Fair Housing Action Plan of proposed solutions. Many of the impediments identified in this report will require additional research and on-going analysis by the City of Dalton, local community task forces, or local non-profit organizations. This report does not constitute a comprehensive planning guide; it simply provides analysis as to the current situation and prepares a plan of action to ameliorate existing impediments.

5 Historical Overview of City of Dalton

Dalton, the carpet capital of the world, is located eighty miles north of Atlanta and thirty miles south of Chattanooga, Tennessee, in the valley and ridge region of northwest Georgia. The Cherokee Indians inhabited northwest Georgia long before Europeans settled in the region, and over time they were forced to move as a part of the tragic event, known as the Trail of Tears. About the same time, in 1837, a small village named Cross Plains, which would become Dalton, came into existence as a trade junction crossroads.

Later, in the 1840's John D. Gray's company built the Western and Atlantic Railroad from Terminus (later called Atlanta) to Chattanooga. An organization led by Captain Edward White of New York envisioned the economic possibilities along the rail line, bought the land, and laid out the new town of Dalton with land parcels set aside for parks, schools, churches, and other public buildings. The city was named in honor of Captain White's mother Mary Dalton White.

A connection with the East Tennessee, Virginia, and Georgia Railroad made the town a transfer center. By 1847 Cross Plains had become Dalton, and the mountain scenery and numerous mineral springs in the area drew others to the growing village. The legislature carved Whitfield County out of Murray County in 1851, and soon after Dalton became the county seat.

In January 1861, Georgia seceded from the Union and in April the Civil War began. In 1863 the Confederate defeat in the "Battle above the Clouds" in Chattanooga brought the Confederate retreat directly to Dalton's environs. As many as thirteen battles took place in the Dalton area, including the battles of Tunnel Hill and Resaca, before Sherman's troops outflanked the Confederates to the south in their campaign to capture Atlanta in 1864. Union troops destroyed much of Dalton and after the war; many Dalton residents began to develop more manufacturing opportunities in the city. In early 1885 local entrepreneurs opened the Crown Cotton Mill, the first large-scale manufacturing plant in the region. After struggling initially, the mill began to thrive, eventually adding mill-village homes and then expanding with the construction of Boylston Crown Mill. Later, American Thread Mill built a facility south of town. In 1895, the colonial practice of tufting was revived and started Dalton's long history of carpet production. This skill enabled people in this area to survive the great depression. After World War II, the development of yardage machines, which could make tighter rows and wider widths, refocused the industry toward the production of carpets and rugs. Today, the major companies in Dalton are Shaw Industries, Inc., Mohawk Industries, Inc., Beaulieu of America Inc., and J & J Industries Inc.

After the 1970's the town began to develop a remarkable international complexion. In 1980s the demand for additional laborers in the chicken -processing plants drew in smaller numbers of Latinos. Realizing that the work ethic of the incoming Hispanics was strong, even though their English-language skills were sometimes weak, carpet-mill owners began to employ them in large numbers. By 2000 more than 40 percent of the town's residents were Hispanic. There is also a solid Hispanic business base, led by the Latin American Community Alliance, along with numerous Latino religious and cultural organizations.

6 Demographics

According to the 2010 Decennial Census, Dalton had a total population of 33,128. In 2012, the City had a total population of 33,314. The City's racial makeup consisted of 80.5% White, 7.9% Black or African American, 2.9% Asian, 0.3% Native American, less than .01% of Pacific Islanders, 5.2% identified as some other race, and 3.2% of the population that identified as belonging to two or more races. The City's ethnic makeup consisted of 48.0% of the populations identifying as Hispanic or Latino of any race.

Dalton Demographic Profile Highlights

Dalton Demographic Profile Highlights: 2012 U.S. Census Figures		
Total population	33,314	100.00%
Male	15,476	46.5%
Female	17,838	53.5%
One race	32,263	96.8%
Two or more races	1,051	3.2%
White	26,825	80.5%
Black or African American	2,644	7.9%
American Indian and Alaska Native	102	0.3%
Asian	954	2.9%
Native Hawaiian and Other Pacific Islander	0	0.0%
Some other race	1,738	5.2%
Hispanic or Latino	14,902	44.7%

Source: 2012 ACS 3-Year Estimates

In 2012, the median household income in the Dalton was \$34,272, and the median income for a family was \$40,689. The per capita income for the city was \$19,365.

Dalton Demographic Profile Highlights

Median household income (dollars)	34,272
Mean household income (dollars)	52,506
Median family income (dollars)	40,689
Mean family income (dollars)	60,230
Per capita income (dollars)	19,365

Source: 2012 ACS 3-Year Estimates

As shown in the table below, the City of Dalton has a significant majority of households with incomes \$25,000 to \$49,999.

Dalton Household Income 2012 U.S. Census Figures		
Total households	11,464	100.0%
Less than \$10,000	976	8.5%
\$10,000 to \$14,999	977	8.5%
\$15,000 to \$24,999	1,873	16.3%
\$25,000 to \$34,999	2,003	17.5%
\$35,000 to \$49,999	1,946	17.0%
\$50,000 to \$74,999	1,602	14.0%
\$75,000 to \$99,999	892	7.8%
\$100,000 to \$149,999	604	5.3%
\$150,000 to \$199,999	219	1.9%
\$200,000 or more	372	3.2%

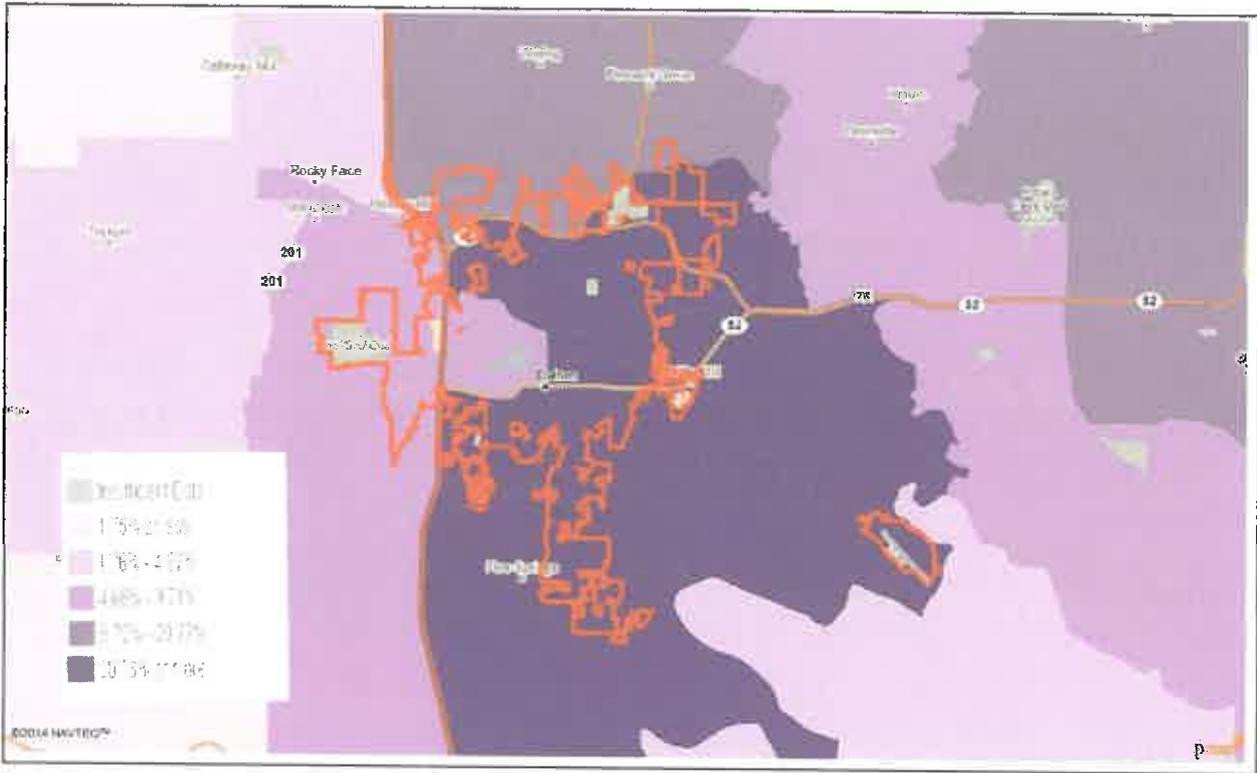
Source: 2012 ACS 3-Year Estimates

Protected Class Analysis

Historically, the non-Hispanic White population has been the majority in Dalton. Over the past 10 years, the percentage of non-Hispanic White population has decreased by about 1.2% from 66.2% 2000 to 65.0% in 2010. The Black/African American share of the total population also decreased in Dalton from 2000-2010 making up 7.7% in 2000 and 6.4% in 2010. There was also a significant increase in the Hispanic/Latino population during the same period. According to the 2000 Census data, Hispanic/Latinos made up 4.0% of the total population and increased to 4.8% in the 2010 Census. The reader should be aware that the definitions and classifications used from one decennial census to the next are subject to change. The sharp increase in population falling into the “Other Population/Two or More Races” category is indicative of such a change in the Census itself and should not be interpreted strictly as a surge in this population group.

The following map illustrates the city limits in orange, while the shaded areas represent minority concentrations through the City tracts. Specifically, this map depicts the pockets of concentration for those non-white persons living in the City of Dalton. The total minority population for the City of Dalton constitutes 22.1% of the total population.

City of Dalton Minority Concentrations



Source: PolicyMap, www.policymap.com

The total percentage of the Hispanic/Latino population increased approximately 7.8% from 2000 to 2010. The ACS estimates for 2012 predict that the Hispanic/Latino Population will decrease slightly to constitute 44.5% of the total population of the City of Dalton. This is down from the 48.0% of the total population in 2010 but continues to represent a 4.3% increase in the total population from 2000, when Hispanic/Latino persons made up 40.2% of the total population.

Hispanic Population in Dalton

2000	% of Total Population	2010 Census	% of Total Population	2012 ACS Estimates	% of Total Pop	% Change from 2000-2010	% Change from 2010-2012
11,219	40.2%	15,891	48.0%	14,692	44.5	7.8%	-3.5%

Source: 2012 American Community Survey 5-Year Estimate

The following table reflects the percentage of African-Americans residing in the City of Dalton as represented in the 2000 and 2010 Census, as well as the 2012 ACS estimates. In 2010, African-Americans made up 6.4% of the total population. The City had a minimal decrease of 1.3% from the 2000 where 7.7% of the total population was African-Americans.

Black/African American Population by Census Tract

2000	% of Total Population	2010 Census	% of Total Population	2012 ACS Estimates	% of Total Pop	% Change from 2000-2010	% Change from 2010-2012
2,153	7.7%	2,108	6.4%	2,227	6.7%	-1.3%	0.3%

Gender

The proportion of males versus females in Dalton has shown a significant shift from the 2000 Census to the 2012 ACS estimates where the total female population has increased by 4.5% from 2000 and constitutes 7% more of the total population than males in Dalton. The following table indicates 46.5% of the population in Dalton is male and 53.5% of the population is female.

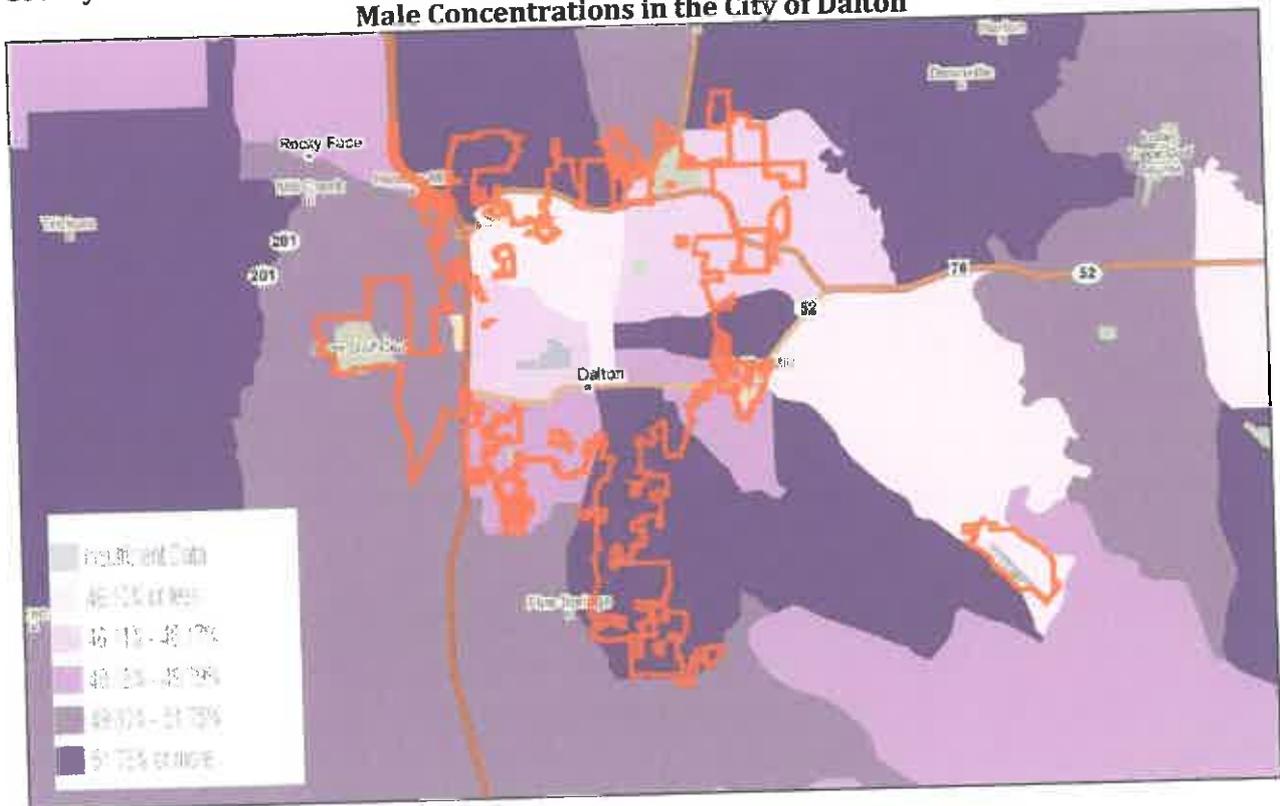
Dalton Historic Gender Composition

	Total Population	Male	Male Percentage	Female	Female Percentage
2000	27,912	14,232	51.0%	13,680	49.0%
2012 ACS Estimate	33,049	15,374	46.5%	17,675	53.5%

Source: 2012 American Community Survey and 2010 Census Data, www.census.gov

There are several areas shown on the map below where the male concentrations are over 51.7% in terms of the total population in those areas. These areas are found in the southern and eastern boundaries of the City and continue to extend in to other areas of Whitfield County.

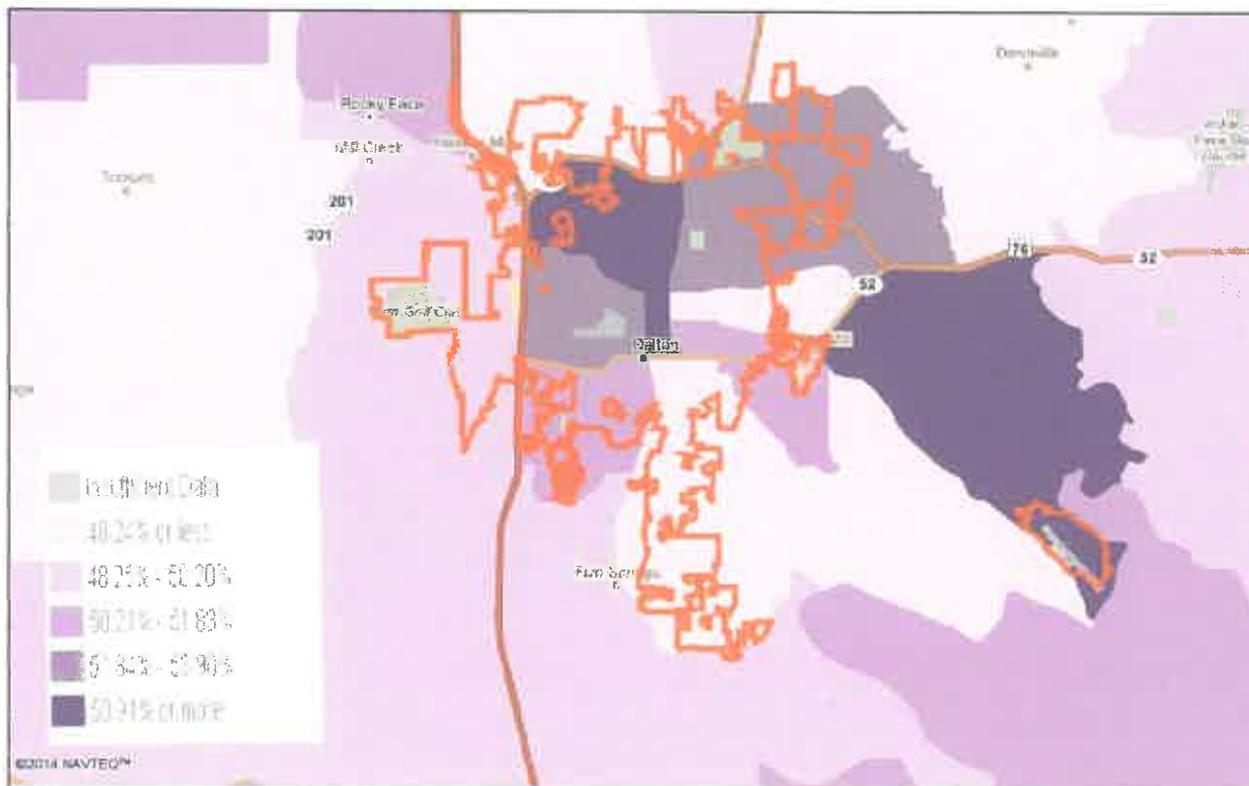
Male Concentrations in the City of Dalton



Source: Policy Map, www.policymap.com

Similarly, female concentrations in the City of Dalton are reflected in higher percentages ranging from 51.8% up to 53.9% and more.

Female Concentrations in the City of Dalton



Source: Policy Map, www.policymap.com

A comparison of the 2000 and 2010 Census data reveals a significant increase in the number of families with children, as evidenced by the total percentage of families with children increased by over 700 unique households and the total share of married couples with children increased by 2 percentage points. The data also revealed an increase in the number of female head of households with children in Dalton from 588 in 2000 to 1,052 in 2010.

Familial Status in City of Dalton

Household Type	2000		2010	
Total Households	9,689		11,337	
Families	6,515	67.20%	7,582	66.90%
Families w/ Children	3,322	34.30%	4,098	36.10%
Married Couple Families	4,833	49.90%	5,143	45.40%
Married Couple Families w/ Children	2,496	25.80%	2,691	23.70%
Female HH, no Husband	1,113	11.50%	1,720	15.20%
Female HH, no Husband, w/ Children	588	6.10%	1,052	9.30%
Non-Family Household	3,174	32.80%	3,755	33.10%
HH Living Alone	2,672	27.60%	3,097	27.30%
HH Living Alone [over 65 years]	1,047	10.80%	1,122	9.90%

Sources: Census 2000 and 2010 Census, www.census.gov

According to the 2012 ACS 5-Year Estimates, 26.5% of the total population of is foreign born. Foreign-born Latin Americans make up 23% of the total population in Dalton, and 86.9% of the total foreign-born population. Foreign-born Europeans comprise 1.6% of the total foreign-born population; while Asians comprise 2.5% of the total population and 9.5% of the foreign-born population.

National Origin of Residents in Dalton

National Origin	2012 Estimates	Percentage of Total Population
TOTAL POPULATION	33,049	100%
Total Foreign Born	8,764	26.50%
Foreign Born - Europe	142	1.60%
Foreign Born - Asia	830	9.50%
Foreign Born - Africa	91	1.00%
Foreign Born - Latin America	7,612	86.90%
Foreign Born - North America	89	1.00%
Foreign Born - Oceania	0	0%

Sources: Census 2008-2012 American Community Survey 5-Year Estimate, www.census.gov

The 2008-2012 ACS estimates show that approximately 59.1% of the City’s civilian, non-institutionalized population aged 18 to 64 was disabled. The data from the 2012 ACS also shows that 17.7% of the total population of Dalton to be disabled.

Disability Status in City of Dalton

Selected Social Characteristics in the U.S.		
Total Civilian Non-institutionalized Population	32,320	100%
With a disability	3,998	17.70%
18 to 64 years	19,110	59.10%
With disability	1,920	5.90%

Source: 2008-2012 American Community Survey 5-Year Estimates, www.census.gov

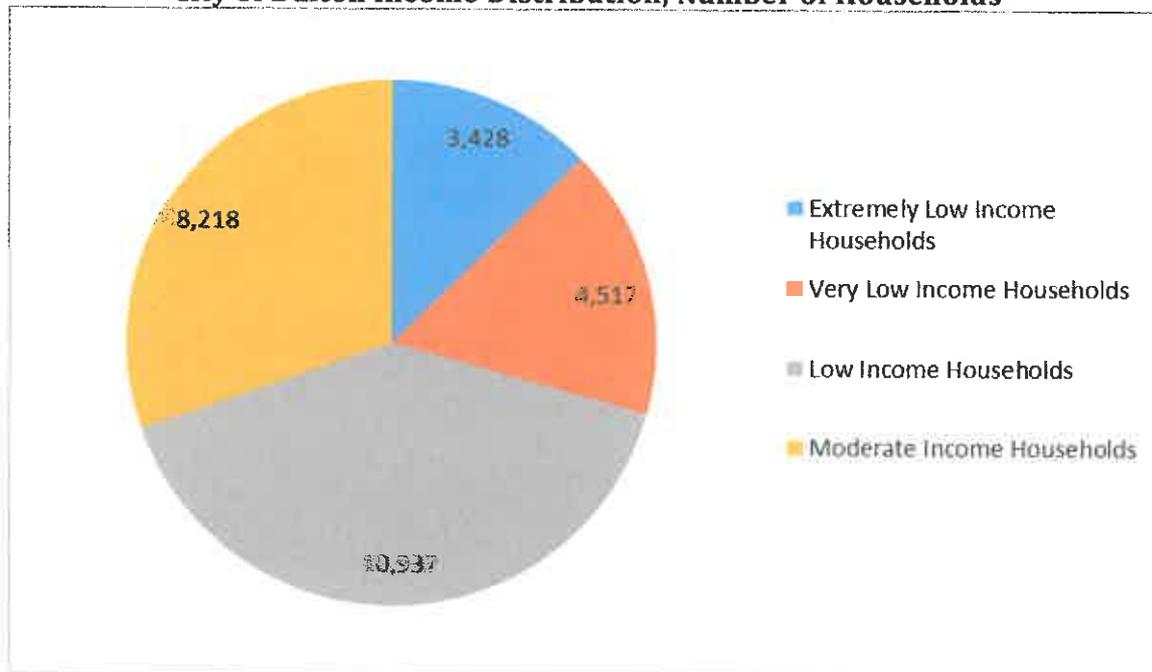
7 Economic Analysis

Household income is the most important factor in determining a family's ability to balance housing costs with other basic life necessities. Household income is the means by which most individuals and families finance consumption and make provision for the future through saving and investment. As such, the level of cash income can be used as an indicator of the standard of living for most of the population. While economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

HUD has established the following income categories based on the Area Median Income (AMI) for the City of Dalton:

- Extremely Low Income Households (Less than 30% AMI)
- Very Low Income Households (30-50% AMI)
- Low Income Households (50-80% AMI)
- Moderate Income Households (80-100% AMI)

City of Dalton Income Distribution, Number of Households



Source: HUD FFIEC Data, 2010, www.ffiec.gov

Family and Household Income

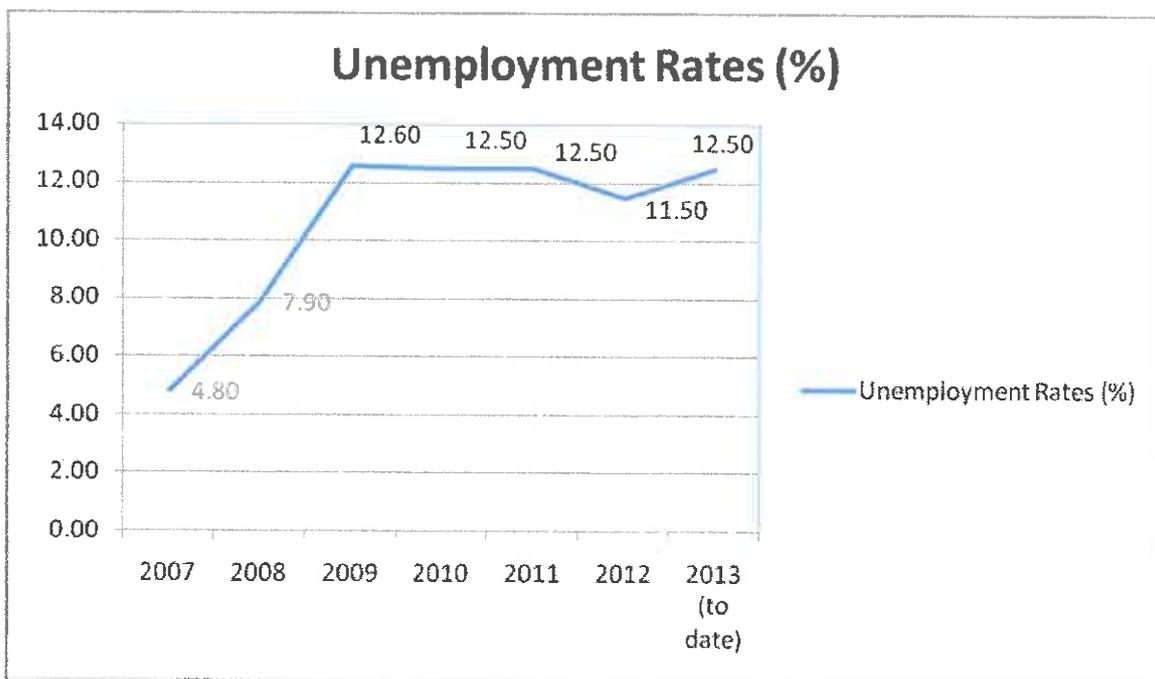
According to the 2010 Census, the median family income in Dalton was \$45,682 and the median household income was \$38,231. Males had median earnings of \$28,158 compared to \$23,701 in median earnings for females. By comparison, the median family income in 2010 was 11.1% higher than its level in the year 2000 at \$41,111. As compared to the median household income in 2000 which was \$34,312, reflecting 11.4% increase in income.

In 2010, the per capita income for Dalton was \$21,430. Comparatively, the per capita income in 2000 was \$20,575. While not unaffected by the economic downturn of the last several years, the impact on the City's families and households appears, at least through Census figures, to have been minimal.

Unemployment

As indicated in the chart below, the unemployment rate in Dalton has more than doubled from 2007 to 2009 as job growth slowed and the economy fell into recession. At its highest point during 2010 and 2011, the area's unemployment rate was at 13.6%, almost 50% higher than the national rate of 9.3%. The annual unemployment rate in 2013 was over 9.5%.

City of Dalton Unemployment Rate



Note: Unemployment data for 2012 is current as of August, 2013.

Source: Bureau of Labor Statistics Local Area Unemployment Statistics <http://data.bls.gov/pdq/>

Poverty

According to the 2010 Census, 3.3% of families and 5.0% of all residents of Dalton fell below the poverty line. The poverty rate for the City of Dalton is lower than the rates for the State of Georgia, in which 10.0% of all families and 14.0% of resident have incomes below the poverty level. Of all children under the age of 18 in Dalton, 9.4% lived in poverty, while 3.9 % of residents over the age of 65 lived in poverty.

Poverty Percentage

PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL		
	City of Dalton	State of Georgia
All families	3.3%	10.0%
With related children under 18 years	5.5%	16.2%
With related children under 5 years only	6.4%	19.8%
Married couple families	1.4%	4.5%
With related children under 18 years	2.0%	6.4%
With related children under 5 years only	2.2%	6.6%
Families with female householder, no husband present	15.6%	30.8%
With related children under 18 years	21.8%	39.4%
With related children under 5 years only	29.5%	50.8%
All people		
All people	5.0%	14.0%
Under 18 years	6.4%	19.3%
Related children under 18 years	6.1%	18.9%
Related children under 5 years only	6.4%	23.7%
Related children 5-17 years	6.0%	17.1%
18 years and over	4.5%	12.3%
18 to 64 years	4.6%	12.9%
65 years and over	3.9%	9.3%
People in families	3.6%	11.1%
Unrelated individuals 15 years and over	14.2%	26.2%

Source: 2008-2012 American Community Survey 5-Year Estimates, U.S. Census Bureau, www.census.gov

Workforce and Industry

As depicted in the following chart, Dalton's workforce is comprised of 85.5% private wage and salary workers, 8.9% government workers, 5.5% self-employed business owners, and with less than 1% of unpaid family workers. The largest sector of the workforce in the City of Dalton is manufacturing making up 37.5% of the total workforce. The second largest percentage of the workforce is educational services, health care and social assistance, at 14.3%, followed closely by arts, entertainment, and recreation, and accommodation, and food services at 10.1%.

City of Dalton Industry Sector Percentages

Industry	Labor Force	Percent
Class of Worker		
Private Wage and Salary Workers	12,230	85.5%
Government Workers	1,274	8.9%
Self-employed in own not incorporated business workers	792	5.5%
Unpaid Family Workers	0	0.0%
Total Private Industry		
Civilian employed population 16 years and over	14,296	--
Agriculture, forestry, fishing and hunting, and mining	67	0.5%
Construction	827	5.8%
Manufacturing	5,356	37.5%
Wholesale trade	376	2.6%
Retail trade	1,386	9.7%
Transportation and warehousing, and utilities	251	1.8%
Information	195	1.4%
Finance and insurance, and real estate and rental and leasing	407	2.8%
Professional, scientific, management, and administrative and waste management services	1,010	7.1%
Educational services, and health care and social assistance	2,045	14.3%
Arts, entertainment, and recreation, and accommodation, and food services	1,441	10.1%
Other services, except public administration	600	4.2%
Public Administration	335	2.3%

Source: 2008-2012 American Community Survey 5-Year Estimates, U.S. Census Bureau, www.census.gov

Largest Employers in Dalton

Company	Industry
Shaw Industries Group, Inc.	Manufacturing
Mohawk Industries Inc	Manufacturing
Beaulieu Group LLC	Manufacturing
Hamilton Health Care System	Health Care
Dalton Public Schools	Education
Tandus Group	Professional Service
J & J Industries Inc	Manufacturing
City of Dalton	City Services

Source: Dalton-Whitfield County Economic Development Authority

http://www.daltonwhitfieldeconomicdevelopment.com/images/stories/PDF/dalton_community_profile.pdf

Public Schools

For the 2012-2013 school year, 7,225 students (ages 3-12th grade) attended public schools within the City of Dalton Public School District. The Dalton Public School District is composed of 9 schools; 6 elementary schools, 1 middle school, and 2 high schools. The Georgia AYP Summary 2011, which is the most recent data available, reported that all 9 schools in the district are classified as Title I schools. A Title 1 schools is defined as a school that meets the criteria to receive federal funds due to having a high percentage of low-income students who are at risk of not meeting their state's academic standards. When a Title 1 school fails to meet AYP goals after five consecutive years, a plan must be prepared to restructure the school. The plan must include one of the following: reopen the school as a public charter school; replace all or most of the school staff; enter into a contract for a private company to operate the school or arrange for the state to take over operation of the school. ⁷

⁷ *No Child Left Behind: A Parent's Guide*. US Department of Education, June 2003: 8-9. Web. 18, September 2012.

8 Home Mortgage Data Act (HMDA) Analysis

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the lending/credit crisis. Lending practices of financial institutions and the access to financing for all households, particularly minority households and those with lower incomes can be examined by reviewing the Home Mortgage Disclosure Act [HMDA] data. Lending patterns in low and moderate income neighborhoods and areas of minority concentration can also be examined through this data. Homeownership is vital to a community's economic well-being. To live up to the requirements of fair housing law, all persons must have the ability to live where they want and can afford. Prospective homebuyers need access to mortgage credit and programs that offer homeownership should be available without discrimination. This section examines detailed HMDA data for the City of Dalton, which includes an analysis of Loan Application Records (LAR) and Transmittal Sheet (TS) raw data collected under the Home Mortgage Disclosure Act (HMDA).

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions with offices in metropolitan areas to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market. As promulgated by rules, these lenders must disclose the number of loan applications by census tract, and by the income, race, and gender of the applicant and co-applicant. Each year, the lender must report the number of loan applications it approved and denied. The lender must also indicate how many of its loan approvals were not accepted (the institution approved the loan but the applicant refused). Finally, the lender must specify how many applications were withdrawn (the applicant withdrew his application before the bank made a credit decision), and how many applications were incomplete (the applicant did not provide all the necessary information).

The national 2011 HMDA data consists of information reported by 7,632 home lenders including all of the nation's largest mortgage originators: 4,497 banking institutions; 2,017 credit unions; and 1,118 mortgage companies, and 812 independent mortgage companies⁸. The HMDA data include the type, purpose, and characteristics of each home mortgage that lenders originate or purchase during the calendar year. Place-based data at the census-tract level were made available for the properties related to those loans including loan pricing information, demographic, and additional information about loan applicants including sex, race, ethnicity, income, and other information.

The primary data source for this analysis was the 2011 HMDA dataset assembled from data for the City of Dalton MSA/MD. HMDA data from 2007, 2008, 2009 and 2010 were also used to examine trends in home loan approval and denial rates.

Limitations of the HMDA Data

⁸ R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. "The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act." Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

Within each HMDA microdata record some of the data variables are 100% reported: "Loan Type," "Loan Amount", "Action Taken", for example, but other data fields are less complete. For example, for the 2011 Regional HMDA data, 10.8% of the records contained no race-related data (information not provided by applicant or not applicable). For "Reason for Loan Denial," for which there is no requirement for reporting; 86.8% of the records did not have the relevant information.

Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. The reasons for incomplete data are not explained in the HMDA documentation so it is impossible to assess the biases that could arise from analyzing the data. It is possible that the reasons for the omitted data were systematic and therefore may have had a significant but unknown effect on the analytical results, particularly for those variables with a large proportion of omitted data like "Reasons for Loan Denial." Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the analytical results.

The HMDA data does not include a borrower's total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio or loan product choices. Research (Avery, et. al., 2012) has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in the HMDA data. Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use the HMDA price data in conjunction with information from loan files to assess an institution's compliance with the fair lending laws.

Lending Practices

Between 2007 through 2011, the City of Dalton had experienced a steady decline in its housing market, as evidenced by the consistently decreasing number of conventional home purchase loan originations shown in the following table. In 2007, 269 of home loans were originated in Dalton which is a slight decrease when compared to 2008 in which only 200 home loans were originated. Comparatively, in 2009 Dalton had a total of 230 loans originated and 218 in 2010 with the most significant loan origination decrease in 2011 with only 197 loans originated. The median loan amount in 2011 was \$107,000.

ALL LOAN ORIGINATIONS 2007-2011					
All Originations	2007	2008	2009	2010	2011
Number of Loans	269	200	230	218	197
Median Loan Amount	\$119,000	\$129,500	\$124,500	\$122,500	\$107,000

Source: Policy Map: <http://www.policymap.com>

The analysis of the 2011 HMDA data for originations by loan purpose reflects the ongoing trauma in the housing and mortgage markets and shows only 38.07% of loans in 2011 were used to purchase new homes, while 61.93% of loans were used for refinancing.

ORIGINATIONS BY LOAN PURPOSE					
Purchase	2007	2008	2009	2010	2011
Number of Loans	146	77	82	98	75
Median Loan Amount	\$112,000	\$114,000	\$97,000	\$109,000	\$91,000
Percent of All Loans	54.28%	38.50%	35.65%	44.95%	38.07%
Refinance	2007	2008	2009	2010	2011
Number of Loans	123	123	148	120	122
Median Loan Amount	\$124,000	\$141,000	\$150,000	\$136,500	\$123,000
Percent of All Loans	45.72%	61.50%	64.35%	55.05%	61.93%

Source: Policy Map: <http://www.policymap.com>

Loan Approval Rate by Race & Ethnicity Analysis

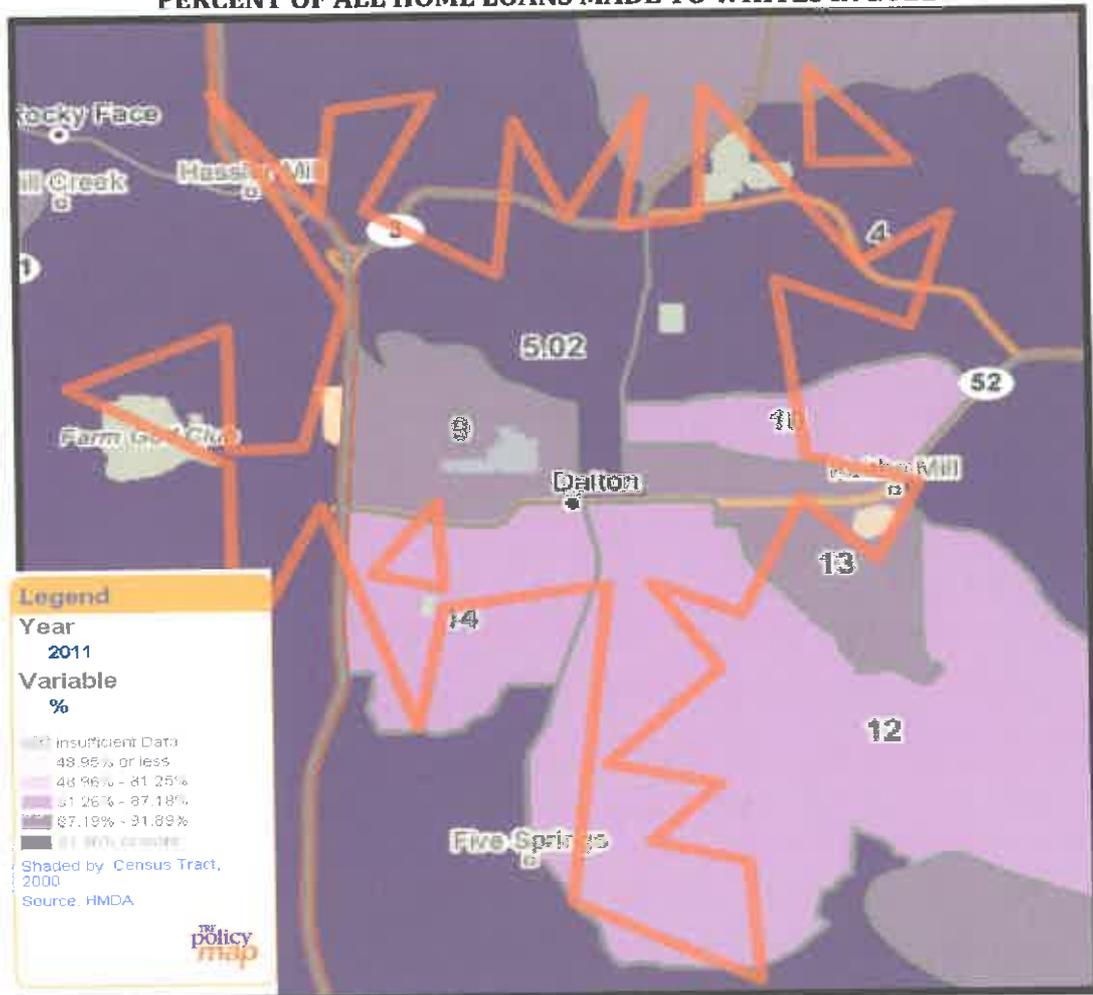
In reviewing loan originations by race in 2011, 88.32% of loans were originated to Whites, 2.03% were originated to African Americans, .51% were originated to Asians, and 23.34% of loans were originated to Hispanics. Citywide, Non-Hispanic White residents submitted the most home loan applications in 2011, accounting for the largest percentage of all home loans in Dalton.

ORIGINATIONS BY RACE					
Loans to Whites	2007	2008	2009	2010	2011
Number of Loans	238	180	203	196	174
Median Amount of Loans	\$118,500	\$130,500	\$127,000	\$122,500	\$105,000
Percent of Loans that were made to Whites	88.48%	90%	88.26%	89.91%	88.32%
Loans to African Americans	2007	2008	2009	2010	2011
Number of Loans	1	4	3	8	4
Median Amount of Loans	N/A	N/A	N/A	\$84,500	N/A
Percent of Loans that were made to African Americans	0.37%	2%	1.30%	3.67%	2.03%
Loans to Asians	2007	2008	2009	2010	2011
Number of Loans	3	2	7	7	1
Median Amount of Loans	N/A	N/A	\$171,000	\$160,000	N/A
Percent of Loans that were made to Asians	1.12%	1%	3.04%	3.21%	0.51%
Loans to Hispanics	2007	2008	2009	2010	2011
Number of Loans	107	59	49	56	44
Median Amount of Loans	\$111,000	\$101,000	\$95,000	\$82,500	\$75,500
Percent of Loans that were made to Hispanics	39.78%	29.50%	21.30%	25.69%	22.34%

Source: Policy Map: <http://www.policymap.com>

In 2011, Non-Hispanic White residents held the largest number of loan originations [174] citywide. Non-Hispanic Whites accounted for over 88% of all applications in 2011. African Americans accounted for only 2% of home loans, while Asians comprised less than 1% of home loans. Hispanic residents accounted for over 22% of all home loans. The following maps will identify the percent of all home loans by census tract that were made to Whites, African American, and Hispanics.

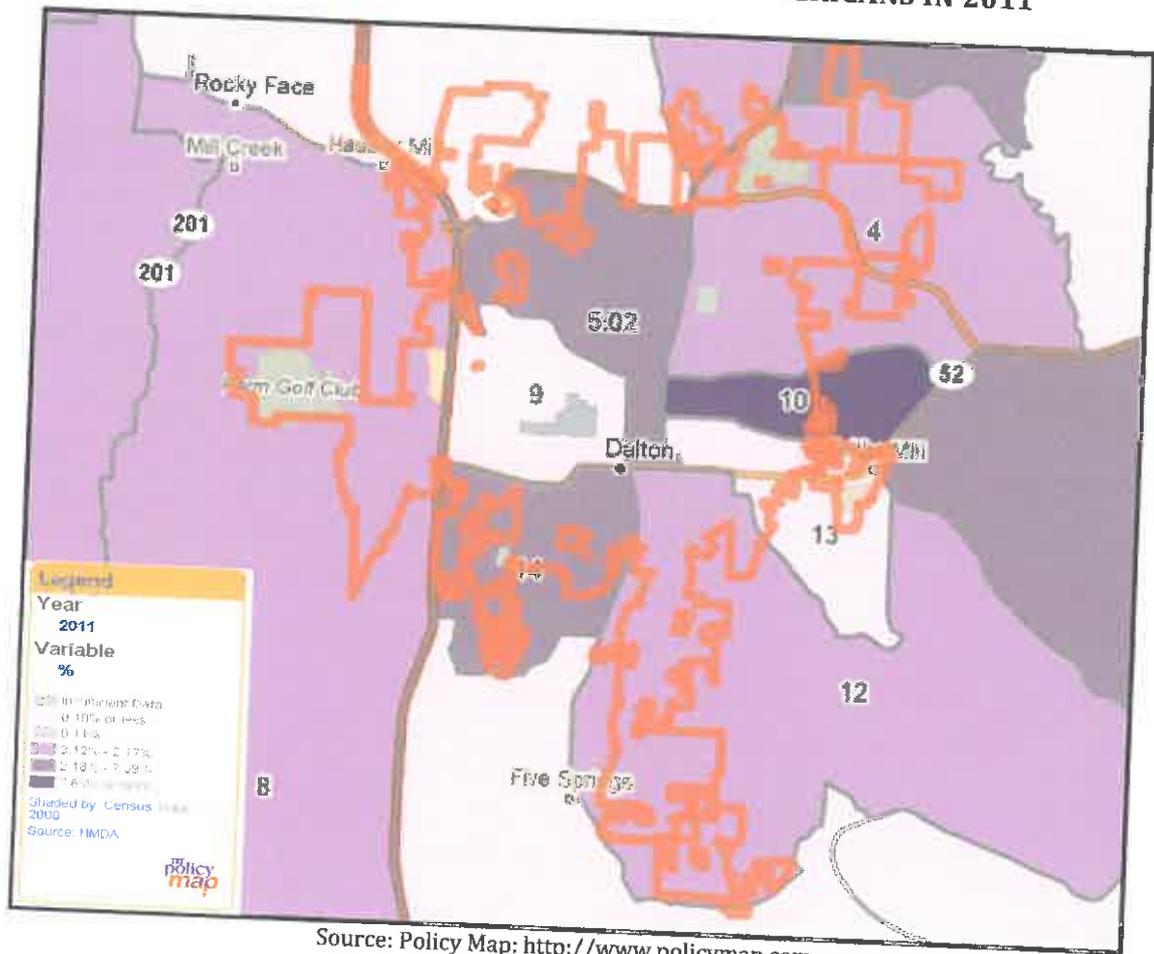
PERCENT OF ALL HOME LOANS MADE TO WHITES IN 2011



Source: Policy Map: <http://www.policymap.com>

As shown from the map above, a high percentage [91.9% or more] of home loans that were made to non-Hispanic Whites located in census tract 5.02. In 2011, Non-Hispanic Whites had noticeably higher loan origination rates than minority applicants.

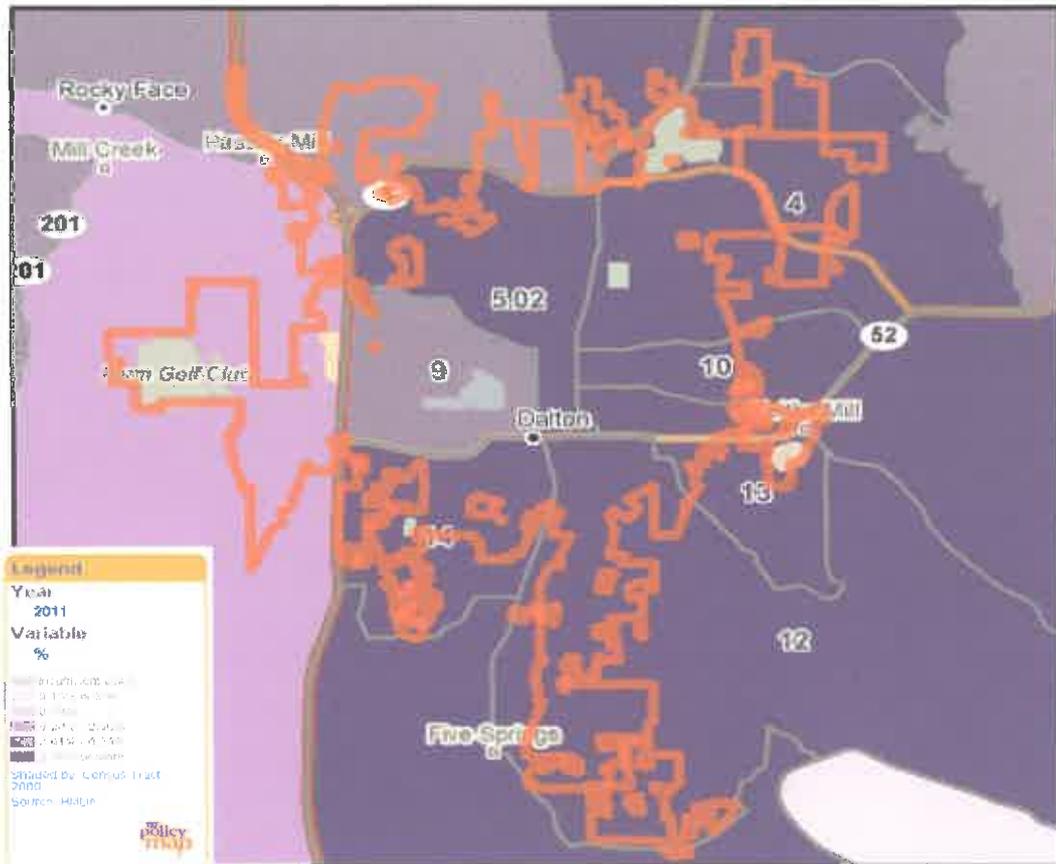
PERCENT OF ALL HOME LOANS TO AFRICAN AMERICANS IN 2011



Source: Policy Map: <http://www.policymap.com>

The majority of all home loans originations that were made to African Americans concentrated in census tract 5.02 of which all of these tracts had approximately 7.60% or more of home loan applications by African Americans.

PERCENT OF ALL HOME LOANS TO HISPANICS IN 2011



Source: Policy Map: <http://www.policymap.com>

The majority of loans that were made to Hispanics were from throughout the City in which the largest percentage of home loan originations to Hispanics was 8.34% or more.

Loans Approval and Denials

Nationally, the number of loan applications is down substantially from the levels at the height of the housing boom. HMDA data show the same trend was evident in the City of Dalton for several years after the housing crash. The loan approval rate was based on calculations from the 2011 HMDA program data. For 2013, HUD set the Area Median Family Income (MFI) for Whitfield County was \$47,949⁹ which provided the basis for calculating the low, moderate, and high income limits used in the following table.

⁹ Source: <http://www.huduser.org/portal/datasets/il/fmr00/hud00pa.txt>. Whitfield County FMR.

**CITY OF DALTON
NUMBER OF HOME LOANS BY BORROWER'S MSA MEDIAN INCOME
2007-2011**

Borrower's Income is Less Than 50% of MSA Median Income											
2007		2008		2009		2010		2011			
Number of Loans	%	Number of Loans	%	Number of Loans	%	Number of Loans	%	Number of Loans	%		
18	6.60%	20	10%	17	7.30%	29	13.3%	19	9.6%		
Borrower Income Between 50-80% MSA Median											
2007		2008		2009		2010		2011			
Number of Loans	%	Number of Loans	%	Number of Loans	%	Number of Loans	%	Number of Loans	%		
86	32.0%	39	19.5%	62	27.0%	48	22.0%	46	23.4%		
Borrower Income Between 80-120% MSA Median											
2007		2008		2009		2010		2011			
Number of Loans	%	Number of Loans	%	Number of Loans	%	Number of Loans	%	Number of Loans	%		
50	18.6%	47	23.5%	37	16.1%	40	18.4%	34	17.3%		
TOTALS											
2007		2008		2009		2010		2011			
154	57.2%	106	53.0%	116	50.4%	117	53.7%	99	50.3%		

Source: Policy Map: <http://www.policymap.com>

The most striking aspect of the number of home loans by borrower's income for the City is the consistent overall decrease of loan applications and approvals over the period of the data. Applications decreased from 154 in 2007, to 117 in 2010, and finally to 99 in 2011. From a high of 57.2% loans approved in 2007, by 2011 the number had declined to 50.3%, a net decline of 6.9% with a nearly constant downward slope.

Summary of HMDA Analysis Findings

HMDA is essential in understanding the mortgage climate in the City of Dalton, although the data does have limitations. It does not take into consideration how the loan decisions were made (i.e. credit worthiness) nor is a lender required to report the race, sex, and income data for loans that they purchase from other institutions (i.e. mortgage brokers). These and other issues must be taken into consideration when reaching assumptions about the findings. The data does provide information about possible trends in the City's mortgage climate. The 2011 HMDA data clearly shows a trend with respect to the low numbers of Black applicants and low- and moderate-income applicants; as well as the high levels of denials of loans to Black and low income applicants.

This Dalton HMDA analysis reflects significant differences in loan approvals and denials due to race and ethnicity. However, based on the data alone however it was not possible to determine if the lender motivation for this disparate treatment was due to economic reasons or social discrimination or both.

9 Fair Housing Complaints

HUD's Office of Fair Housing and Equal Opportunity (FHEO) administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through the respective Regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is initiated.

If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination", as well as a "Charge of Discrimination", and a hearing is scheduled before a HUD administrative law judge. Either party (complainant or respondent) may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court.

The national study "*How Much Do We Know*" published by HUD in 2002, reports that only half of the public could correctly identify as unlawful six out of eight scenarios describing illegal fair housing conduct. Less than one-fourth of the public knows the law in two or fewer of the eight cases. In addition, HUD's study found that 14% of the adult population claims to have experienced some form of housing discrimination at one point or another in their lives. Of those who thought they had been discriminated against, 83% indicated they had done nothing about it, while 17% say they did pursue a complaint. In HUD's follow-up study *Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law* (published in 2006) 41% of the former survey respondents said it was "very likely" they would do something about future discrimination compared to only 20% in the initial survey.¹⁰ The survey revealed that 46% of those who reported having experienced discrimination in the past and done nothing about it said they would very likely do something about future discrimination.

Individuals with more knowledge are more likely to pursue a complaint than those with less knowledge of fair housing laws. Therefore, there is an association between knowledge of the law, the discernment of discrimination, and attempts to pursue it. Locally, it is critical that there are efforts in place to educate, to provide information, and to provide referral assistance regarding fair housing issues in order to better equip persons with the ability to assist in reducing impediments.

According to the National Fair Housing Alliance (NFHA) 2012 Fair Housing Trends Report¹¹, more disability complaints have been filed than any other type of fair housing complaints. NFHA suggests that this may be attributed to apartment owners' direct refusal to make reasonable accommodations or modifications for people with disabilities. As a result, HUD has implemented the Fair Housing Accessibility FIRST program to assist in educating architects and builders regarding design and construction of accessible housing units.

¹⁰ Martin D. Abravanel and Mary K. Cunningham, *Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law*, U.S. Department of Housing and Urban Development, February 2006. Source: <http://www.fhco.org/pdfs/DoWeKnowMoreNowSurvey2006.pdf>

¹¹ HUD Policy Research & Development *Do We Know More Now? Trends In Public Knowledge, Support And Use Of Fair Housing Law*. <http://www.huduser.org/Publications/pdf/FairHousingSurveyReport.pdf>

Complaints Filed With HUD

Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. The mission of the FHEO is to protect individuals from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence. The following table identifies the number of complaints filed by location at which the alleged discrimination occurred, the status of the complaint, and the basis for the complaint.

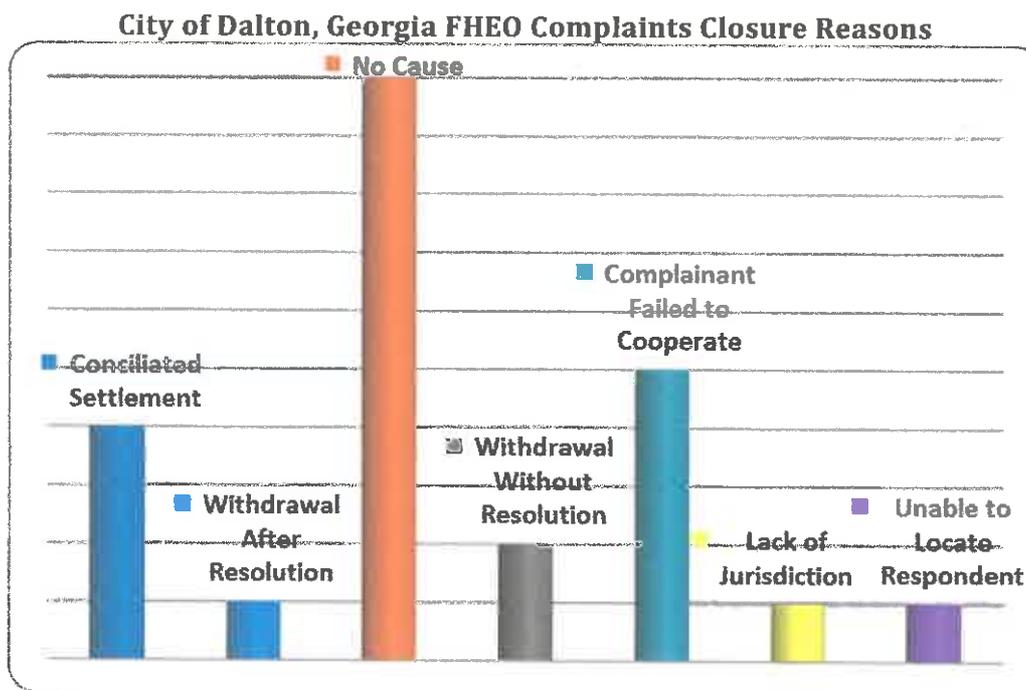
From January 1, 2003 through May 31, 2013 there were 24 housing complaints filed in Dalton. Of these complaints, seven were determined to have cause and four of the complaints were settled through conciliation with one complaint being awarding a total settlement amount of \$10,000. Only one of the "with cause" complaints was withdrawn after resolution. As of May 31, 2013, all 24 FHEO complaints have been closed.

Complaints of Housing Discrimination Received in Dalton, Georgia

City of Dalton, Georgia					
Number Filed	Number Closed	Number Open	With Cause	Settlement Awarded	Total Settlement Awarded
24	24	0	7	4	\$10,000
Characteristics of Complaints Filed					
Disability		8	Age		0
Color/Race		6	Citizenship		0
Familial Status		4	Religion		4
Marital Status		0	Retaliation		0
Sex		4	Harassment		0
National Origin		7	Other/Criminal Status		0

Source: U.S. Housing & Urban Development Office of Fair Housing and Equal Opportunity

This review of complaints shows that the overwhelming majority of complaints filed and investigated [33] by the Atlanta FHEO for the City of Dalton was based on disability and national origin status, respectively at 24% and 21% of the total types of Protected Class complaint filings with color/race and familial status, sex, and religion as the next largest complaints at 18% and 6%. A lack of filed complaints does not indicate that a problem does not exist. It should be noted that these complaint numbers may exceed the total number of filings, due to multiple discrimination allegations within a single complaint.



Source: U.S. Housing & Urban Development Office of Fair Housing and Equal Opportunity

Summary of Findings

An examination of fair housing complaints for jurisdictions can be used as an indicator to identify heavily impacted areas and characteristics of households experiencing discrimination in housing. However, it is important to note that reviewing the number of fair housing complaints filed within a given community cannot by itself be used as a direct indicator of fair housing problems in that community. As noted in the FHEO Summary of Complaints for Dalton, the largest numbers of complaints filed were alleged claims of discrimination based on disability status and national origin.

A lack of complaints filed with no cause determination is also not indicative of the number of fair housing discrimination in a community. Many households do not file complaints because they are uneducated about the process of filing a complaint. However, there are households that are aware that they are experiencing housing discrimination, but they are simply not aware that this discrimination is against the law. Finally, most households are more interested in achieving their first priority of finding decent affordable housing and prefer to avoid going through the process of filing a complaint and following up to ensure the case is resolved.

In conducting this fair housing complaint analysis, several data limitations should be noted again that the fair housing complaints filed in the City of Dalton represents the location in which the discrimination occurred and may include complaints filed from residents of surrounding jurisdictions.

10 Fair Housing Education

Fair housing education is a critical aspect in reducing fair housing violations and provides citizens knowledge of their rights and of their options when they feel their rights have been violated. A logical assumption can be made that the more complaints that are filed, the more likely people are aware of their rights and what is covered in the Fair Housing Act. The baseline measurement regarding public awareness of fair housing issues comes from a national survey conducted in 2000 by the HUD. The survey revealed that “majorities of the adult public were knowledgeable about and approved of most aspects of the law¹². However, only a small percentage of survey respondents who asserted their fair housing rights had been violated took action. In 2005, a follow up survey was conducted by HUD to measure the increase of national public awareness of fair housing rights and the survey revealed very little change in public awareness overall, however public support for fair housing had dramatically increased.

Public awareness of fair housing issues and laws ensures that citizens know their rights and what to do if their rights have been violated. In general, fair housing services can typically include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Services can also include providing landlord/tenant counseling that educates landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislation as well as mediating disputes between tenants and landlords.

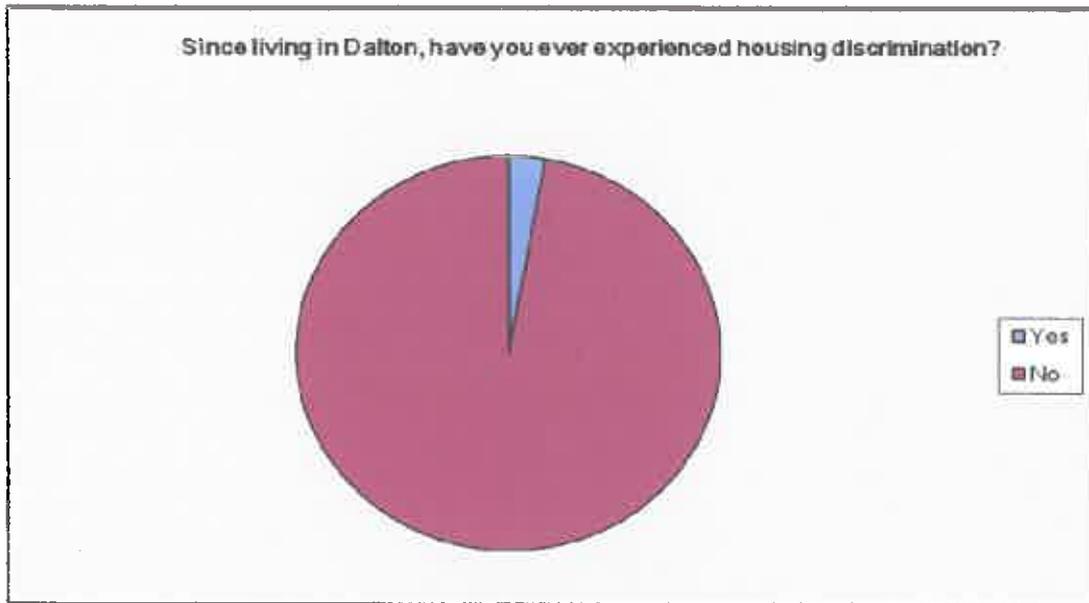
The City of Dalton does not have any organization solely dedicated to providing fair housing education to residents of the City. The US Department of HUD Region IV Office of Fair Housing and Equal Opportunity (FHEO) receive complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Georgia, Florida, Alabama, Mississippi, Tennessee, Kentucky, North Carolina, and South Carolina.

Based on the responses derived from the Fair Housing Survey conducted in conjunction with this Analysis, many residents in the City expressed a need for improvement on fair housing education efforts directly to the housing industry and to the general public. A brief summary of the survey responses are as follows:

When asked if any of the survey respondents had ever experienced housing discrimination, 35 out of 36 [97.2%] of survey respondents stated they had never experienced housing discrimination. While 1 [2.8%] of respondents reported that they had experienced housing discrimination.

¹² Martin D. Abravanel and Mary K. Cunningham, Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law, U.S. Department of Housing and Urban Development, February 2006. Source: <http://www.fhco.org/pdfs/DoWeKnowMoreNowSurvey2006.pdf>

Residents who have Experienced Discrimination in the City of Dalton



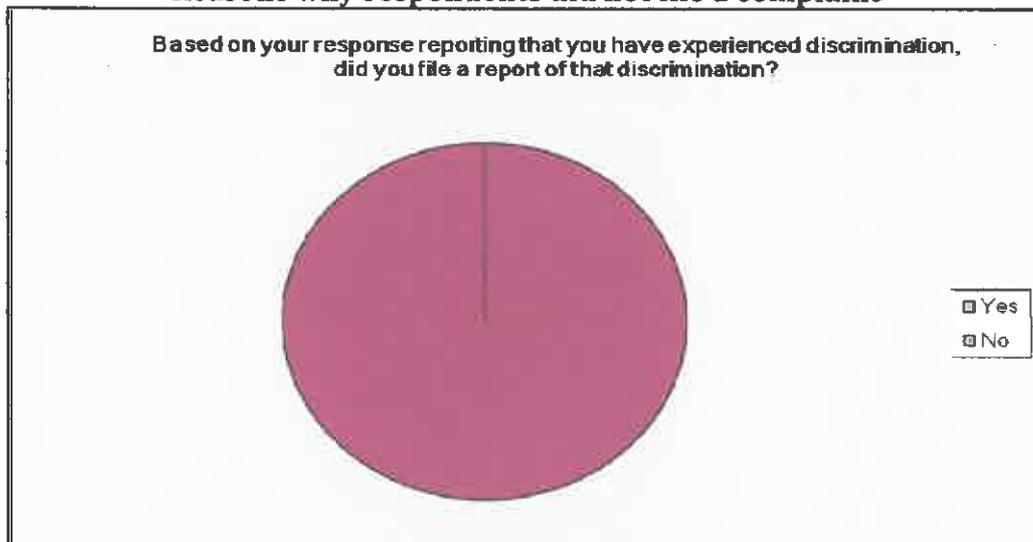
Source: City of Dalton Fair Housing Survey

<http://www.surveymonkey.com/MySurveyResponses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2lDlfvo3FoNsbA77w%3d>

The respondents that had experienced discrimination were asked a follow-up question to ascertain the source of discrimination. The survey respondent who reported that they had been discriminated against did not file a complaint.

The respondent stated that a fair housing complaint was not filed because they did not know what good it would do.

Reasons why respondents did not file a complaint



Source: City of Dalton Fair Housing Survey

<http://www.surveymonkey.com/MySurveyResponses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2lDlfvo3FoNsbA77w%3d>

When asked if survey respondents were knowledgeable about their fair housing rights, 22 out of 36 survey respondents [61.1%] stated they were either familiar or somewhat familiar with fair

housing rights. While 14 of the 36 survey respondents [38.9%] stated they did not know their fair housing rights.



Source: City of Dalton Fair Housing Survey

<http://www.surveymonkey.com/MvSurvey/Responses.aspx?sm=H5OhK1YklvoH4TGnSERF05T4ZL2lDifvo3FoNsbA77w%3d>

While HUD has not determined a national standard for the adequate level of public awareness; HUD encourages jurisdictions to make a continual effort to increase public awareness of fair housing laws. HUD's FHEO encourages jurisdictions to implement education and outreach activities in an effort to reduce potential violations of fair housing laws. Knowing about the laws and their penalties can serve as a deterrent and help protect against discrimination complaint charges being filed in the City of Dalton.

11 Affordable Housing Snapshot

Affordability is an important aspect in regards to fair housing choice and individuals being able to obtain secure, safe, and decent housing. It is also a significant factor for residents attempting to select housing that meets their current family needs. HUD defines “housing affordability” as housing-related expenses (rent and utilities) that do not cost more than 30 percent of a family’s income.¹³ Homeowners or renters who are paying more than 30 percent of their income on housing-related costs are at the most risk for experiencing cost burdens. Gross cost burden is generally defined as individuals paying 30-50 percent of gross household income while severe cost burden is generally defined housing costs that exceed 50 percent of gross household income. Such a standard allows sufficient income for other basic elements of living, such as food, medical care, transportation and clothing.

HUD presents affordability data by income ranges based on median family income. HUD divides low and moderate-income households into categories, based on their relationship to the median family: extremely low-income (earning less than 30 percent of the MFI), very low-income (earning between 30 and 50 percent of the MFI), low-income (earning between 50 and 80 percent of the MFI) and moderate-income (earning between 80 and 95 percent of the MFI). According to HUD, the 2013 Median Family Income (MFI) for a 4-person household in Dalton is \$50,600.

Dalton FY2013 Income Limits

City of Dalton, Georgia										
FY 2013 Income Limit Area	Median Income	FY 2013 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Dalton, Georgia	\$50,600	Very Low (50%)	\$17,750	\$20,250	\$22,800	\$25,300	\$27,350	\$29,350	\$31,400	\$33,400
		Extremely Low (30%)	\$10,650	\$12,200	\$13,700	\$15,200	\$16,450	\$17,650	\$18,850	\$20,100
		Low (80%)	\$28,350	\$32,400	\$36,450	\$40,500	\$43,750	\$47,000	\$50,250	\$53,500

Source: Department of Housing & Urban Development, HUD User Dataset, Income Limits, www.huduser.org.

Housing choices are fundamentally limited by household income and purchasing power. Cost, therefore, restricts housing choice, particularly for those with lower incomes. In many cases, minority households have a much higher incidence of poverty and are therefore, disproportionately impacted by housing costs as well as other individuals included in the protected classes that may have limited incomes.

¹³ U.S. Department of Housing and Urban Development, <http://www.hud.gov/offices/cpd/affordablehousing/index.cfm>

Housing

As shown in the 2011 American Community Survey, Dalton has a total of 13,532 housing units, of which 14.3% were vacant. Much of the housing stock in Dalton has aged, as evidenced by the 65% of units built prior to 1990. The most common type of housing in the City is single-family detached units. Of the total housing units, 6,376 [47.1%] were single-family detached units, while 6,138 [45.5%] were multi-family units. According to the 2011 ACS Estimates, Dalton has a considerably smaller portion of mobile homes which is comprised of 1.3% of the total housing units for the City.

The table above provides a detailed account of the average listing prices and median sales prices in Dalton.

FY2013 Income Limits

Dalton ZIP codes	Avg. listing price Week ending Dec 4, 2013	Median sales price Date range: Sept '13 - Dec '13	Trulia popularity Week ending Dec 4, 2013
30720	\$198,111	\$105,200	2
30721	\$189,477	\$90,500	1

Source: Trulia Real Estate Heat Map. www.trulia.com/home_prices/Georgia/Dalton-heat_map/

The table above provides a detailed account of the average listing prices and median sales prices in the City of Dalton.

Affordable Homeownership

As shown in the table below, the median value for a home in Dalton was \$141,000, which is considered affordable for low to moderate-income households. 19.4% of the homes ranged between \$50,000 and \$99,999. The greatest number of homes (29.4%) fell within a range of \$100,000 to \$149,999. Housing costs have continued to increase due to the recent population increases. A little over 32.1% of all homes within the City cost over \$150,000 and \$299,999.

AFFORDABILITY SNAPSHOT	
Dalton, Georgia	
Median value of home	\$141,100
MEDIAN OF SELECTED MONTHLY OWNER COSTS	
Housing units with a mortgage	3,761
Housing units without a mortgage	2,075
HOME VALE OF OWNER-OCCUPIED UNITS	
Less than \$50,000	364
\$50,000 to \$99,999	1,134
\$100,000 to \$149,999	1,713
\$150,000 to \$199,999	1,035
\$200,000 to \$299,999	842
\$300,000 to \$499,999	470
\$500,000 to \$999,999	278
\$1,000,000 or more	0
SELECTED MONTHLY OWNER COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME	
Less than 20.0 percent	1,542
20.0 to 24.9 percent	576
25.0 to 29.9 percent	357
30.0 to 34.9 percent	209
35.0 percent or more	1,065
GROSS RENT	
Less than \$200	39
\$200 to \$299	331
\$300 to \$499	931
\$500 to \$749	2,465
\$750 to \$999	1,246
\$1,000 to \$1,499	428
\$1,500 or more	120
Median (dollars)	\$658
GROSS RENT AS A PERCENTAGE OF HOUSEHOLD INCOME	
Less than 15.0 percent	830
15.0 to 19.9 percent	727
20.0 to 24.9 percent	577
25.0 to 29.9 percent	667
30.0 to 34.9 percent	693
35.0 percent or more	2,015

Source: 2011 American Community Survey, [http:// http://factfinder2.census.gov](http://factfinder2.census.gov)

Affordable Rental

Information detailed in the Renter Affordability table is relative to rental tendencies and rental rates in the City of Dalton. The 2011 ACS Estimates counted 13,532 housing units in Dalton with an occupancy rate of 85.7%. According to the National Low Income Housing Coalition's "Out of Reach" 2013 Annual Report, in Dalton, the Fair Market Rent (FMR) for a two-bedroom apartment is \$623 and in order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$2,077 monthly or \$24,920 annually

A minimum wage worker in Dalton earns an hourly wage of \$7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 66 hours per week, 52 weeks per year. Or, a household must include a wage-earner making \$11.98 an hour and working 40 hours per week year-round in order to afford the two bed-room FMR.

On the basis of this salary analysis, the renter must work above and beyond 40 hours per week to meet the two-bedroom FMR affordability rate. As depicted in the following table, 47% of Dalton residents are unable to afford a two bedroom at the fair market rent as assessed by HUD.

Dalton Renter Affordability

Number of Households 2011		
	STATE	DALTON
Total		
Renter	4,063,024	13,532
%Renter	1,158,069	5,766
2011 Area Median Income	14.1%	49.7%
Annual		
Monthly	\$59,262	\$45,682
30% of AMI	\$4,939	\$3,807
Maximum Affordable Monthly Housing Cost by % of AMI	\$17,779	\$13,704
30		
50	\$444	\$343
80	\$741	\$571
100	\$1,185	\$914
2011 Fair Market Rent (FMR)*	\$1,482	\$1,142
Zero Bedroom		
One-Bedroom	\$603	\$472
Two-Bedroom	\$657	\$511
Three-Bedroom	\$795	\$623
Four-Bedroom	\$1,059	\$800
Annual Income Needed to Afford FMR*	\$1,263	\$997
Zero Bedroom		
One-Bedroom	\$24,131	\$18,880
Two-Bedroom	\$26,299	\$20,440
Three-Bedroom	\$31,793	\$24,920
Four-Bedroom	\$42,363	\$32,000
Percent of AMI Needed to Afford FMR	\$50,520	\$39,880
Zero Bedroom		
One-Bedroom	41%	37%
	44%	40%

Two-Bedroom	53%	49%
Three-Bedroom	71%	63%
Four-Bedroom	85%	79%
Renter Household Income*		
Estimated Median Renter Household Income	\$29,400	\$26,838
Percent Needed to Afford 2BR FMR	108%	93%
Rent Affordable at Minimum Wage	\$843	\$982
% of Renters Unable to Afford 2BR FMR	54%	47%
2011 Minimum Wage		
Minimum Wage	\$7.25	\$7.25
Rent Affordable at Minimum Wage	\$377	\$377
2011 Supplemental Security Income		
Monthly SSI Payments	\$710	\$710
Rent Affordable at SSI	\$213	\$213
Housing Wage*		
Zero Bedroom	\$11.60	\$9.08
One-Bedroom	\$12.64	\$9.83
Two-Bedroom	\$15.28	\$11.98
Three-Bedroom	\$20.37	\$15.38
Four-Bedroom	\$24.29	\$19.17
Housing Wage as % of Mean Renter Wage*		
Zero Bedroom	87%	90%
One-Bedroom	95%	86%
Two-Bedroom	115%	105%
Three-Bedroom	153%	135%
Four-Bedroom	182%	169%
Work Hours/Week at Minimum Wage Needed to Afford FMR*		
Zero Bedroom	64	50
One-Bedroom	70	54
Two-Bedroom	84	66
Three-Bedroom	112	85
Four-Bedroom	134	106
Full-time Jobs at Minimum Wage Needed to Afford FMR*		
Zero Bedroom	1.6	1.3
One-Bedroom	1.7	1.4
Two-Bedroom	2.1	1.7
Three-Bedroom	2.8	2.1
Four-Bedroom	3.4	2.6
Full-time Jobs at Mean Renter Wage Needed to Afford FMR*		
Zero Bedroom	0.9	0.8
One-Bedroom	0.9	0.9
Two-Bedroom	1.1	1.1
Three-Bedroom	1.5	1.4
Four-Bedroom	1.8	1.7

Source: National Low Income Housing Coalition, "Out of Reach" 2013 Annual Data, <http://www.nlihc.org/>

Household Income Costs

As indicated in the Affordability Snapshot of Household Income Costs, Dalton has a significant percentage of homeowners spending more than 30% of their annual household income on housing-related costs.

According to 2011 ACS Estimates, the City has 34% of owners spending more than 30% of their annual household income on housing-related costs, while the City only has 9.5% of owners who have housing costs ranging from 25% - 29.9%. The increased percentage in 30% and above category may be correlated to the recent economic shift in the housing market.

SELECTED MONTHLY OWNER COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME		
Less than 20.0 percent	1,542	41.1%
20.0 to 24.9 percent	576	15.4%
25.0 to 29.9 percent	357	9.5%
30.0 to 34.9 percent	209	5.6%
35.0 percent or more	1,065	28.4%

Source: 2011 American Community Survey, [http://http://factfinder2.census.gov](http://factfinder2.census.gov)

Vacancy

According to the 2011 Census estimates, the overall vacancy rate overall for Dalton is 14.3% [1,930 units]. Moderate to low vacancy rates are reflective of varying levels of demand, which will continue to add pressure to increase rents. These rates could also mean that prospective renters, particularly low-income renters, have a difficult time finding housing in Dalton. The table provides a snapshot of Dalton's occupied and vacancy status by type of unit.

DALTON HOUSING PROFILE HIGHLIGHTS	
Total housing units	13,532
Occupied housing units	11,602
Owner-occupied	5,836
Renter-occupied	5,766
Vacant housing units	1,930
Housing units with a mortgage	3,761
Housing units without a mortgage	2,075
Occupied units paying rent	5,561

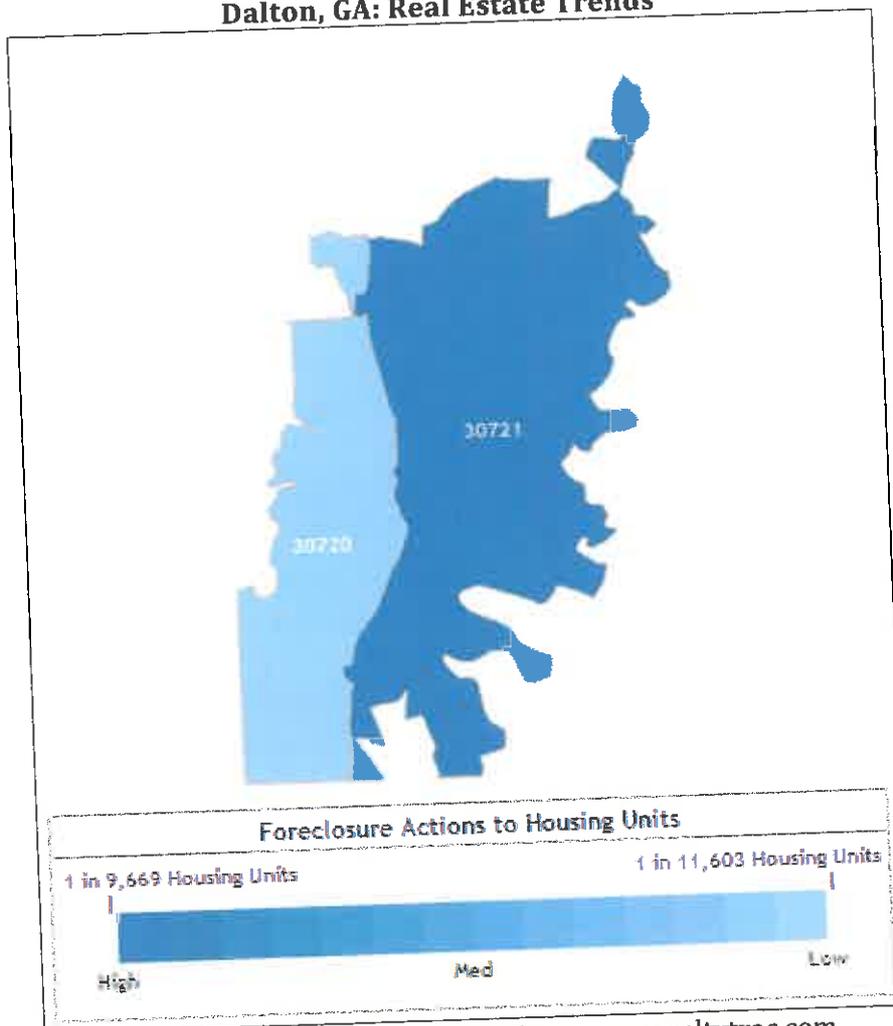
Source: 2011 American Community Survey, [http://http://factfinder2.census.gov](http://factfinder2.census.gov)

Foreclosure Data

The national housing market has experienced a catastrophic downfall due to the excess housing supply, lending disruptions and high unemployment rates. Additionally, foreclosure rates have also increased due to the high quantity of sub-prime mortgages and adjustable-rate mortgages that were issued during the housing market boom.

Similar to other areas of the country, the City of Dalton has experienced an increase in foreclosure rates over the last several years. While the increasing number of foreclosures has had a negative impact on the City as a whole, for certain census tracts, the damage has not been as severe as other parts of Georgia and the U.S. According to the 2011 American Community Survey estimates, Dalton has 5,836 owner-occupied housing units of which 333 were in some stage of foreclosure as stated in RealtyTrac.com's December 2013 foreclosure data. These foreclosures are located in zip codes 30720 and 30721, which is consistent with the percentages of low-moderate income persons residing in these areas as shown in the following map.

Dalton, GA: Real Estate Trends



Source: December 2013, RealtyTrac, www.realtytrac.com

Persons with Disabilities & Elderly

As shown in the following table, the City has several multi-family housing units that serve the elderly population and persons with disabilities. These units tend to offer rental assistance and housing credit programs funded by HUD. These units make for a combined total of 188 federally

assisted units ready for occupancy in the City. Out of the total number of assisted units [168] in the City, [48] 28.5% are set-aside as HUD rental assistance units for the elderly.

Multi-Family Housing Inventory for Elderly and Disabled Dalton, Georgia

Property Name/Address	Occupancy Eligibility	Total Units	Total Assisted Units	Total Units Designated for Elderly	Total Units Designated for Disabled
Mountain Woods Apartments 1016 Ponderosa Lane Dalton, GA 30720	Family	100	80	0	0
Whitfield Commons 519 Hawthorne St. Dalton, GA 30720	Elderly & Disabled	40	40	0	0
Whitfield Place 1320 Winton Dr Dalton, GA 30720	Elderly	48	48	48	0
TOTALS		188	168	48	0

HUD: MFH Inventory Survey of Units for the Elderly and Disabled, <http://www.hud.gov/offices/hsg/mfh/hsgrent.cfm>

Workforce Housing

Some definitions of workforce housing may tie affordability to the portion of a household’s income expended for housing costs. Other definitions may include housing that is affordable to households with incomes up to 120% or more of the AMI, [which would be \$60,720 or more for a family of four], in Dalton. Still others may equate affordable housing with public housing, which is generally restricted to households with incomes up to 50% of the AMI (\$25,300 for a family of four in Dalton). The ambiguity of the term “affordable housing” and the negative connotations that can be associated with it (e.g. subsidized housing, public housing, housing for households receiving public assistance) often leads to a substitution term such as “workforce housing”. Workforce housing would generally be for households with incomes 50%-80% of the AMI, excluding those with very low (under 50% AMI) and extremely low (under 30% AMI) incomes.

Summary of Findings

Affordable housing costs in Dalton are a pressing concern among residents. Increased housing-related expenses can place significant cost burdens on residents which may impact their ability to obtain affordable housing as cost tends to restrict housing choice, particularly for those with lower incomes. The lack of affordable housing can cause many service-sector and even some professional-sector workers to live long distances from the places they work, resulting in long commute times and inordinate strain on the City’s infrastructure systems. The City must continue to address the need for housing for elderly and disabled persons. Though the lack of fully accessible apartments for persons with disabilities may pose a strong barrier to this population’s housing choice, options for elderly and disabled adults appear to be relatively available throughout the City.

12 Infrastructure

Public transportation plays a critical role in affordable housing stock to groups in need and others guaranteed protection under fair housing laws. The issue regarding transportation and fair house choice concerns accessibility to which a resident may travel from home to work. This issue is imperative as it deals with lower income areas or areas involving minority concentrations. For example, if there is a lack of accessible public transportation in a lower cost neighborhood, then that neighborhood becomes immediately inaccessible to those without other means of dependable transportation. This will particularly hinder mobility for very low income residents, elderly residents, and persons with disabilities.

Public Transportation Use for Workers

	2006-2010 Census Estimates	% of Total Commuters
Dalton	19	.001%

Source: U.S. Census Bureau, American Community Survey 2006-2010, www.census.gov

Commuting in Dalton

The City of Dalton is comprised of 19.84 square miles. The following table estimates that as of 2011, 81.6% of Dalton residents commute to work driving alone using a car, truck, or van. This compares to only 13% who carpool; .001% using public transportation; 1.3% walk; and 1.7% who work from home.

Dalton Transportation Highlights

Public Transit use for Workers 16 and older Commuting to Work		
Method	Number of Commuters	% of Commuters
Car, Truck, or van and driving alone	11,029	81.6%
Car, Truck, or van and carpooling	1,761	13.0%
Public Transportation (excluding taxis)	19	.001%
Walked	176	1.3%
Other Means	669	4.9%
Working from Home	226	1.7%

Source: 2009-2011 American Community Survey Estimates, www.census.gov

The following table estimates that as of 2010, 79.7% of Dalton residents commute to work driving alone using a car, truck or van. This compares to only 6.1% who carpool; 1.3% using public transportation; 1% walk; and 9.6% who work from home.

Dalton Economic Highlights	
Employment Status [Population 16 years and older]	
Population 16 years and older	24,116
In Labor Force	15,694
Civilian Labor Force	15,592
Employed	14,296
Unemployed	1,296
Armed Forces	102
Not in Labor Force	8,422
Commuting to Work [Workers 16 years and older]	
Car, Truck, or van and driving alone	11,029
Car, Truck, or van and carpooling	1,761
Public Transportation (excluding taxi)	19
Walked	176
Other Means	669
Working from Home	226

Source: U.S. Census Bureau, American Community Survey 2007 - 2011, www.census.gov

Bus Services

The City of Dalton does not currently have its own public transportation service. However, Whitfield County operates and maintains a public transit service. The Whitfield County transit service operates 11 routes throughout the County and the City of Dalton. Whitfield County's transit rate is \$4.00 for each one-way trip. The transit service runs Monday -Friday from 6:30 a.m. until 6:00 p.m. with the last call back pickup at 4:30 p.m.

Pedestrian and Bicycle Network

Though downtown Dalton has an adequate sidewalk network, connectivity between the downtown and residential uses is limited, and sidewalk/bicycle provisions outside of Dalton in general are not extensive.

According to the 2009 - 2011 American Community Survey estimates, 1.3% of commuters walk to work daily and 4.9% of commuters use other means of transportation to work. While these numbers are increasing, they do not represent an adequate number of accessible areas for non-motorized transportation options.

Roads

Major thoroughfares in the City of Dalton include:

- Interstate 75 (I-75)
- Scenic route 71 (SR71)
- Scenic route 52 (SR52)
- U.S 41
- U.S 76

Water & Sewer

The availability of water and sewer can act as an impediment for siting of affordable housing. Large developments need access to water and sewer in order to obtain the necessary planning approvals. Impact fees, also referred to as sewer and water connection fees, discourage new housing construction, particularly affordable housing projects that are undertaken by non-profit housing developers and community development corporations. In preparation of this *Analysis*, the management of water and sewer services in the City of Dalton was reviewed to determine if the City's services significantly impact fair housing choice.

In 1887, the Dalton Water Works (which later became Dalton Utilities) was built at the site of the Crown Cotton Mill Spring. Dalton Utilities is a department of the City of Dalton and manages the City's water system. The City's water system handles 37.4 million gallons of water per day and has a drought contingency storage of 2.54 billion gallons to meet their customers' water needs for a two-month period in severe drought conditions. Dalton Utilities accesses water through 4 sources: the Conasauga River/Coahulla Creek, Mill Creek, Freeman Springs, and Eastside Utilities (water from the Tennessee River). The water serves the City of Dalton, Whitfield County, and portions of Murray and Catoosa Counties.

Over 75% of the residents of the City of Dalton are provided wastewater services through Dalton Utilities. The remainder of the population relies on private wastewater systems. The sanitary sewer system consists of over 300 miles of pipeline, 36 lift (pumping) stations, and a 9,200 acre forested Land Application System. Approximately 20 - 25 million gallons of wastewater is treated per day and Dalton Utilities has the capacity to treat over 66 million gallons in any day, if necessary.

Once the wastewater has been treated, it is sprayed onto the forested Land Application System where the soil and plant life further cleanse the water. Solids removed from the wastewater have liquid spun out in large centrifuges made especially for the bio-solids handling facility. The drier solids ("cake") are mixed with wood waste to make compost. The assessment of the City's water and sewer services did not reveal any barriers to fair housing for residents of the City of Dalton.

13 Land Use & Zoning

While private actions principally influence the housing market, regulations at the federal, state, and local levels significantly impact the market's ability to provide affordable housing units. The cost of housing and the incentives to develop, maintain, or improve affordable housing in Dalton are directly related. Although many barriers to affordable housing are beyond governmental control, several factors affecting housing costs can be identified at the municipal level. These factors can include zoning ordinances and land use controls. A review of the City of Dalton's comprehensive planning and zoning ordinances can assist the City to identify potential impediments to fair housing choice.

Comprehensive planning is a critical means by which governments address the interconnection and complexity of their respective jurisdictions. The interconnectedness of land uses means that a decision as to the use of a particular piece of property has consequences not only for surrounding property, but for a myriad of other issues as well. Successful comprehensive planning efforts can impact the community and inspire positive changes in a community. Key aspects of a successful comprehensive plan include:

- Offering guidance for the future development, based on examining existing and future land use conditions;
- Develop recommendations on implementation of the community's vision;
- Instill predictability and fairness for citizens, elected officials, city staff, and the development community by providing a community with a visionary future land use plan that provides appropriate recommendations for the type, location, and scale of new development;
- Coordinate with other planning initiatives to establish a more collaborative network of services for the community;

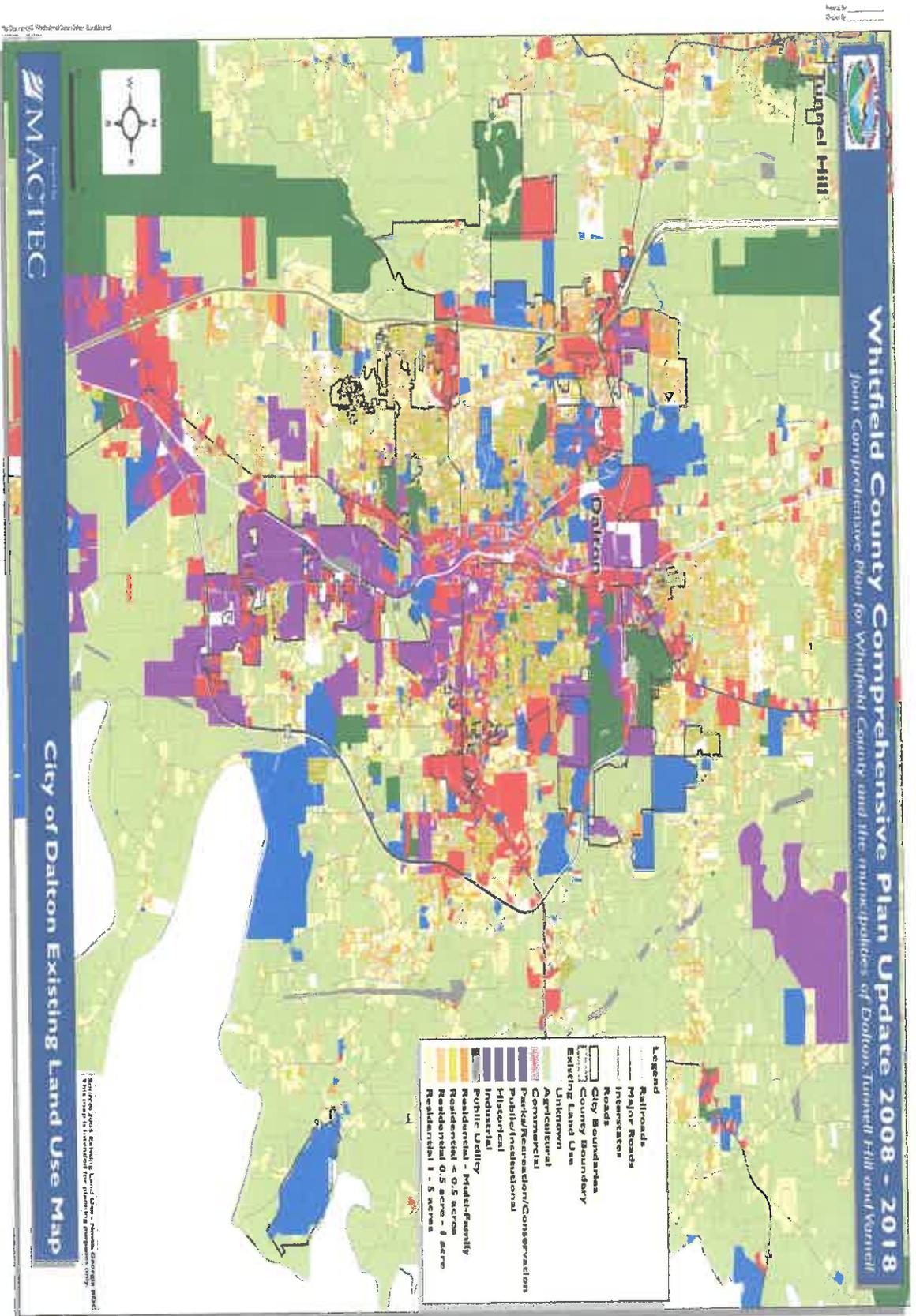
From a regulatory standpoint, local government measures to control land use through zoning often define the range and density of housing resources that can be introduced into a community. In some communities (but not necessarily in Dalton), the zoning provisions that most commonly impact barriers of fair housing choice can include:

- Restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, or require inordinately large lot sizes that deter affordable housing development.
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit.
- Placing administrative and siting constraints on group homes.

City of Dalton Zoning Ordinance

The City regulates all land development within the City of Dalton Zoning Ordinance, under the guidance provided by the City's Comprehensive Plan. The following map will

Whitfield County/City of Dalton Existing Land Use



Source: Dalton-Whitfield County 2008-2018 Comprehensive Plan

Residential Districts

The following residential zoning districts are established in this Unified Development Ordinance:

- R1 – Residential (Medium Density)
- R1A – Residential (Low Density)
- RT – Residential (Medium Density)
- R2 – Residential (High Density)
- R3 – Residential (High Density)
- PUD - Planned Unit Development

Minimum lot size requirements for detached, single-family homes in Dalton range from a 12,500 acre minimum in the R-1A district down to 7,500 square feet (approximately 1/6 of an acre) in all other residential zoning districts. While this range is not considered wide, it provides ample flexibility to housing developers and permits a variety of housing options, including single-family detached, in an affordable price range. Accordingly, Dalton's Zoning Ordinance does not appear to impose unreasonably restrictive lot sizes that would effectively restrict affordable housing development.

Housing choice must necessarily include more options than just single-family detached dwellings. While Dalton's Zoning Ordinance should make single family detached homes affordable for many moderate-income households, low- and very-low income families may require even less expensive options to avoid cost burden. As such, the Zoning Ordinance's treatment of multi-family and other attached forms of housing units must be evaluated.

For residential zoning districts in Dalton, the R2, R3, and RT Zoning Districts provide the most flexibility in terms of lot-line restrictions. For this zoning classification the minimum floor areas for single-family detached homes is 900 square feet. These same zoning districts permit townhomes, duplexes, apartments, and condominiums. The presence of these zones is especially conducive to development of housing that can accommodate lower-income households affordably. Particularly important in multi-family districts is an examination of building height maximums. A multi-family zone with a low maximum building height will restrict the number of units a developer can produce on a certain sized lot, thus reducing the number of units construction and maintenance costs can be spread between and making the resulting housing more expensive. The R2, R3, and RT Zoning districts restrict building heights to 35 feet for all residential uses except condominiums, which have a maximum height allowance of 75 feet. It is important to note that each of these zoning districts: R2, R3, and RT Zoning Districts are structured to be those for medium to high density residential living, which is consistent with the smaller lot sizes allowed and reduced property setbacks.

Below is a map depicting the future land use plan for Dalton, including locations of the various land use districts discussed in this section.

Definition of "Family"

In Section 3.2 of the Dalton Zoning Ordinance, it defines "family" as:

...one or more persons related by blood, legal adoption, or marriage occupying a dwelling where such persons are all related to each other within the fourth degree, as defined in O.C.G.A. § 53-2-1, which includes parents, children, grandparents, grandchildren, brothers and sisters. Great-grandparents shall also be included in the definition of family. State of Georgia authorized foster children of a family member shall also be deemed a member of the family for this purpose, or not more than five adults, not necessarily related by blood or marriage, living together as a single housekeeping unit in a dwelling unit where compensation is not made for housekeeping service for room and board to the owner or operator of such dwelling unit. In zones R-1 and R-1A no more than two adults, not related by blood or marriage, living together as a single housekeeping unit in a single-family dwelling unit where compensation is not made for housekeeping service for room and board to the owner or operator of such dwelling unit will be considered a family for the purposes of this definition. For the purposes of this definition, a person shall be considered to reside in a dwelling unit if he or she stays overnight in a dwelling unit for more than 30 days within a 90-day period, receives mail at the dwelling unit, or lists the dwelling unit as his or her home address on any document. The term "family" does not include any organization or institutional group.

Sharing rent payments with unrelated roommates is a common method for low and moderate-income individuals to achieve affordable housing without putting an excessive cost burden upon the residents. Additionally, the help of an unrelated live-in aide is sometimes desired by the elderly or persons with disabilities. The Zoning Ordinance's comprehensive definition, specifically prohibiting the number of unrelated adults to live together in a dwelling unit in the R1 and R-1A may be interpreted as restrictive and reduce fair housing choices in the City of Dalton.

Restrictions on Residential Uses

Personal Care Homes provide one or more personal care services to resident clients (e.g. convalescent and nursing facilities, foster homes for children, and facilities for the aged, ill, or disabled). However, this type of use is only permitted in the C-3 Commercial District by the Zoning Ordinance. In addition, this type of use is a conditional use meaning that in order for this use to be allowed in the C-3 district it must receive an approval from the Dalton-Whitfield County Planning Commission.

The Dalton Zoning Ordinance makes no specific provisions for temporary housing/shelters or transitional housing uses in the City. There is a provision allowing rooming houses with the conditions that the owner/operator to live on-site. This type of use is a permitted use in the R-3 Zoning District within the City.

Conditional Uses

The City of Dalton provides for the allowance of certain uses within the Business Districts but only as they receive a Conditional Use approval from the Dalton-Whitfield County Planning Commission. A comprehensive review of the Dalton Zoning Ordinance found that that all uses that require a Conditional Use permit are found in the business districts C-3 and C-3A and each are related to housing choice. The uses requiring this type of approve are assisted living home/facility, urban dwelling, and loft dwelling.

Summary of Findings

The City's zoning code is not unreasonably restrictive on lot minimums and provides for relatively small minimum lot sizes across residential zoning districts. Zones for multi-family and other attached dwellings are present and have maximum building heights conducive to development of a variety of housing options. With only the R-1 and R-1A Zoning Districts prohibiting residential uses other than single-family detached structures, the ability to provide affordable housing throughout the residential areas of the City appears to be adequate.

However, the definition of "family" used by the Dalton Zoning Ordinance may be interpreted to restrict the ability of residents to live with roommates or aides, which can impact housing choices particularly for low-income or elderly or disabled residents. Zoning restrictions that effectively prevent large groups of people (the homeless, those recovering from addictions to drugs or alcohol, and those persons under judicial or corrective control) from living in neighborhoods can deprive these individuals of their right to fair housing choice.

14 Current Impediments and Recommendations

This analysis has revealed barriers to fair housing choice in the City of Dalton. In this section, the overarching impediments identified are summarized with supporting examples noted. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, the related impediment. It should be noted that these impediments are systemic and will require effort from both private sector and public sector actors to correct. The City of Dalton has an important role to play but cannot on its own bring about the change necessary to remove these barriers to fair housing choice.

Impediment #1: Lack of Public Transportation Options

Transportation links are essential components to successful fair housing. The issue at hand regarding transportation and fair housing choice revolves around the ease with which a resident can travel from home to work if he or she lives in a lower income area or an area of minority concentration. Residents who do not have access to commercial areas are limited in where they can shop for goods and services, as well as seek employment. The converse is true as well. Inadequate transportation routes limit the selection of housing to neighborhoods within transportation service areas and disproportionately affect low-income, disabled, and elderly residents.

While, the City of Dalton does not currently have its own public transportation service, Whitfield County operates and maintains a public transit service. The County's transit service operates 11 routes throughout the County and the City of Dalton. Whitfield County's transit rate is \$4.00 for each one-way trip which can be costly for low and moderate-income residents.

Recommendations:

It is imperative the City of Dalton continue to work with the County to routinely review transportation planning efforts to advocate public infrastructure improvements that align with the goal of expanding housing choice. While inherently limited by the amount of funding available, the City can collaborate with local nonprofit agencies to allocate resources transportation programs for elderly, disabled, and low-income residents.

Impediment #2: Lack of Fair Housing Education, Testing and Enforcement Capacity

The City of Dalton does not have any organization solely dedicated to providing fair housing education to residents of the City. Results of the Fair Housing Survey indicate that Dalton residents are not especially knowledgeable of their fair housing rights and many do not know how to file a complaint if they feel their rights have been violated. Of those residents who reported facing housing discrimination yet chose not to file a complaint, the predominant reasoning is that they didn't know what good it would do. While education is needed for the public at-large, focused education is also needed for other targeted groups such as mortgage lenders, real estate agents, developers and building inspectors.

Recommendation:

The City of Dalton should annually reserve a portion of its CDBG public service funds to be awarded as a competitive Fair Housing Grant to an organization that will carry out a comprehensive fair housing testing program in the City. As additional component of the Fair Housing Grant, the successful applicant should launch and sustain a robust public interest ad campaign to increase the public's awareness of housing discrimination and of the process for filing a complaint and increase opportunities for representation of victims of discrimination in the pursuit of legal recourse.

Furthermore, the City of Dalton should sponsor specific education opportunities on Fair Housing Act compliance for landlords, builders, real estate agents, and City staff, and the public at large, making periodic training participation mandatory for Departmental staff and entities contracting with the City.

15 Conclusion

Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified which restrict the housing choice available to residents of in the City of Dalton and further prevent them 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 systemic and will require effort from both private sector and public sector actors to correct.

The City of Dalton has an important role to play but cannot on its own bring about the change necessary to remove these barriers to fair housing choice. The recommendations proposed in this document address impediments relative to lack of public transportation options and the lack of fair housing education, testing, and enforcement capacity. Implementation of the recommendations can assist the City of Dalton in achieving the reality of being an open and inclusive community that truly embraces Fair Housing Choice for all its residents.

Appendix

- A. Fair Housing Surveys
- B. Fair Housing Survey Results
- C. Home Mortgage Disclosure Act [HMDA] Data
- D. Fair Housing Complaints

Fair Housing Surveys

Dalton Fair Housing Survey and Needs Assessment

*1. Please indicate the ZIP Code of your residence

30719

30720

30721

30722

Other (please specify)

2. Where do you work?

Dalton, GA

Elsewhere in Whitfield County

Chatsworth, GA

Chattanooga, TN

Not currently working

Somewhere else (please specify)

3. Please **SELECT** the **ONE** income range that best describes your household's total income.

Less than \$10,000

\$10,000 to \$14,999

\$15,000 to \$24,999

\$25,000 to \$34,999

\$35,000 to \$49,999

\$50,000 to \$74,999

\$75,000 to \$99,999

\$100,000 and above

Dalton Fair Housing Survey and Needs Assessment

4. In which field(s) are you employed?

- Health care/medical/dental
- Education
- Social service
- Corporate
- Government
- Uniformed services
- Retail
- Non-profit/social services
- Self-employed
- Professional service (law, real estate, accounting)
- Not currently working

Other (please specify)

5. The U.S. Census Bureau considers the following to be "minority groups": Black or African American, Hispanic or Latino, Asian, Native Hawaiian or Other Pacific Islander, or American Indian or Alaska Native.

Are you a member of a minority group listed above?

- Yes
- No

6. Is a language other than English spoken regularly in your household?

- Yes
- No

If yes, What language?

7. Does anyone in your household have a disability?

- Yes
- No

Dalton Fair Housing Survey and Needs Assessment

8. Which is your age group?

- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65 or older

9. DALTON, GA SURVEY ON FAIR HOUSING

This section of the survey is part of the process of developing an "Analysis of Impediments to Fair Housing Choice" (AI). The AI is a document required by the U.S. Department of Housing and Urban Development (HUD) related to the local receipt of federal funds. Its purpose is to identify barriers to people having equal choice in housing and identify actions that can be taken to overcome those barriers. Part of the process involves hearing from members of the public on issues of fair housing and housing choice. The questions on the following pages are intended to serve that purpose. Please only participate in this survey if you are, or have been, a resident of Dalton.

Your responses will be kept strictly confidential. We will only report this information in combination with the other survey responses and in summary format to protect your privacy. Please do not place your name or other identifying information anywhere on the survey. You have right to discontinue participation at any time without loss of benefits otherwise afforded to you. If you have questions about the use of the survey information, please call WFN Consulting at 770-420-5634.

Begin Fair Housing Survey

10. Thinking about your current living situation, how satisfied would you say you are?

- Very satisfied
- Somewhat satisfied
- Not very satisfied
- Not at all satisfied

Dalton Fair Housing Survey and Needs Assessment

11. If you are not satisfied with your current living situation, what is the primary reason for your dissatisfaction?

- Too far from work
- Too expensive
- Too small
- Too crowded
- Unattractive area to live
- Poor public transportation opportunities
- Housing in poor condition
- Not good places for my kids/schools are not good in the area

Other (please specify)

12. Which of the following are important considerations to you in choosing a place to live? (SELECT ALL THAT APPLY)

- Family nearby
- Convenient retail facilities
- Convenient to medical/pharmacy
- Childcare opportunities
- Good recreation facilities (parks, trails, playgrounds, ball courts)
- Convenient access to transit/bus
- Location close to work
- Attractiveness of neighborhood
- Price of housing

Other (please specify)

13. Have you or someone in your household purchased or leased a residence in Dalton in the past year?

- Yes
- No
- I don't know

Dalton Fair Housing Survey and Needs Assessment

14. Is there sufficient housing in Dalton for persons with disabilities?

- Yes
 No
 I don't know.

15. Is there sufficient housing in Dalton for low to moderate-income persons?

- Yes
 No
 I don't know

16. Is there is an adequate supply of Section 8 rentals/homes available in Dalton?

- Yes
 No
 I don't know.

17. Is there sufficient housing in Dalton for the elderly?

- Yes
 No
 I don't know.

18. Do you currently live in public housing or receive Section 8 rental assistance?

- Yes
 No
 I don't know.

19. Would the availability of multi-lingual real estate brokers and mortgage brokers help in your considering a move to or within Dalton?

- Yes
 No

If yes (what language)

Dalton Fair Housing Survey and Needs Assessment

20. Is Public Transportation to major employers available in your area?

- Yes
 No
 I don't know.

21. Does Public Transportation service coincide with work schedules at your place of employment?

- Yes
 No
 I don't know.

22. Thinking about the following public services provided within the City, which do you feel are provided EQUALLY across all neighborhoods? (SELECT ALL THAT APPLY)

- a)Roads
 b)Police Protection
 c)Water/Sewer
 d)Fire Protection
 e)Schools
 f)Public transportation
 g)Garbage Collection
 h)Code Enforcement
 i)Parks and Recreation

Dalton Fair Housing Survey and Needs Assessment

23. Which of the following public services are NOT EQUALLY provided from one neighborhood to another? (SELECT ALL THAT APPLY)

- a) Roads
- b) Police Protection
- c) Water/Sewer
- d) Fire Protection
- e) Schools
- f) Public transportation
- g) Garbage Collection
- h) Code Enforcement
- i) Parks and Recreation

24. Since living in Dalton, have you ever experienced housing discrimination?

- Yes
- No

25. If you answered yes to question 18, who discriminated against you? (CHECK ALL THAT APPLY)

- a landlord/property manager
- a real estate agent
- a mortgage lender
- a city/county staff person

Other (please specify)

26. Based on your response reporting that you have experienced discrimination, did you file a report of that discrimination?

- Yes
- No

Dalton Fair Housing Survey and Needs Assessment

27. If you answered NO, why didn't you file? (SELECT ONLY ONE)

- I did not know what good it would do.
- I did not know where to file.
- I did not realize it was a violation of the law.
- I was afraid of retaliation.
- The process was not in my native language.
- The process was not accessible to me because of a disability.

Other (please specify)

28. Do you know your Fair Housing Rights? (PLEASE SELECT ONE RESPONSE)

- Yes
- Somewhat
- No

29. Do you know where to file a housing discrimination complaint?

- Yes
- Somewhat
- No

Dalton Fair Housing Survey and Needs Assessment

30. Please evaluate the following possible barriers to fair housing for you and your neighbors on a scale of 1 to 4, (1=not a barrier, 2=a minor barrier, 3=a modest barrier, 4=a serious barrier). PLEASE SELECT ONLY ONE RESPONSE FOR EACH BARRIER.

	Not A BARRIER	MINOR BARRIER	MODEST BARRIER	SERIOUS BARRIER
a. Income levels of minority and female-headed households	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Concentration of low-income housing in certain areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Concentrations of group homes in certain neighborhoods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Limitations on density of housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Lack of adequate zoning for manufactured housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Restrictive covenants by homeowner associations or neighborhood organizations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Limited capacity of a local organization devoted to fair housing investigation/testing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Lack of knowledge among residents regarding fair housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Lack of knowledge among large landlords/property managers regarding fair housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Lack of knowledge among real estate agents regarding fair housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Lack of knowledge among bankers/lenders regarding fair housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Lack of knowledge among insurance industry representatives regarding fair housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Lack of knowledge among appraisers regarding fair housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
n. Use of "neighborhood stability" or similar factors as proxies for racial in makeup appraisals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Dalton Fair Housing Survey and Needs Assessment

Other (please specify)

31. What is your current housing status?

- I own a home
- I rent
- I live in a hotel/motel
- I am homeless

32. How much do you currently pay in rent or mortgage payment per month?

- under \$800/month
- \$800 to \$999/month
- \$1,000 to \$1,500/month
- \$1,501 to \$2,000/month
- \$2,001 to \$3,000/month
- more than \$3,000/month

*33. Please select from the following two choices below:

- I would like to answer additional questions regarding needs in my community.
- I would not like to answer additional questions regarding needs in my community.

Dalton Fair Housing Survey and Needs Assessment

34. Consolidated Plan Needs Assessment

This section of the survey is a needs assessment for the City of Dalton. Every 5 years, the CDBG Program Office will prepare a long range plan for submission to the United States Department of Housing and Urban Development (HUD), which must cover any housing, community development, and homeless needs that might be addressed through the investment of HUD grant funds and other resources during the period of the plan. Submission of the plan to HUD is required to permit the City of Dalton to receive grant funds from HUD.

The City of Dalton is inviting individuals and organizations to assist with the identification of needs for inclusion in the Consolidated Plan for 2014-2019. One vehicle being used to receive input from the community is the following Needs Assessment Survey.

Your participation is important and we encourage your response to the survey so that any needs you identify can be included in the Consolidated Plan.

This is an electronic document that may be submitted through the SurveyMonkey system. However, as an additional method, you may print the survey out and return via mail to the following address:

**Brittany Cagle
City of Dalton
CDBG Program Office c/o Finance Department
Attn: Brittany Cagle, CDBG Program Manager
300 West Waugh Street
Dalton, GA 30720**

Begin Needs Assessment

***35. Please select from the following two options:**

- I am completing this survey as a resident of Dalton.
- I am completing this survey as a representative of an organization/agency.

Dalton Fair Housing Survey and Needs Assessment

36. Which of the following best describes yourself or your organization/agency?

- A non-profit agency
- A trade or professional organization
- A Community Action Agency
- A Public Housing Authority
- A unit of local government
- A unit of state government
- An elected official
- An advocacy group

37. Please rank the following Public Facility Needs within Dalton on a scale ranging from a very low need to a very high need.

	very low need	low need	moderate need	high need	very high need
Senior Centers	<input type="radio"/>				
Youth Centers	<input type="radio"/>				
Neighborhood Community Facilities	<input type="radio"/>				
Child Care Centers	<input type="radio"/>				
Community Parks and Recreational Facilities	<input type="radio"/>				
Cultural Centers including museums, etc.	<input type="radio"/>				
Health Care Facilities	<input type="radio"/>				
Public Safety Offices (Fire, Police, Emergency Management)	<input type="radio"/>				
Sewer Collection and Treatment Facilities	<input type="radio"/>				
Flood Drain Improvements	<input type="radio"/>				
Street/Road Improvements	<input type="radio"/>				
Sidewalk creation/upgrades	<input type="radio"/>				
Government Facilities	<input type="radio"/>				
Land Acquisition	<input type="radio"/>				

Other (please specify)

Dalton Fair Housing Survey and Needs Assessment

38. Please rank the following Economic/Community Development Needs on a scale ranging from a very low need to a very high need.

	very low need	low need	moderate need	high need	very high need
Direct Financial Assistance to For-Profit Agencies	<input type="radio"/>				
Acquisition/Disposition of Vacant Commercial/Industrial Land	<input type="radio"/>				
Development of Vacant Commercial/Industrial Land	<input type="radio"/>				
Redevelopment/Rehabilitation of Commercial/Industrial Buildings including Facade Improvements, Life Safety Corrections, etc.	<input type="radio"/>				
Clearance/Demolition of Blighted Properties	<input type="radio"/>				
Cleanup of Environmentally Contaminated/Brownfields areas	<input type="radio"/>				
Increase of Code Enforcement Efforts	<input type="radio"/>				
Collaboration with Local Non-Profit Organizations	<input type="radio"/>				
Non-Residential Historic Preservation Efforts	<input type="radio"/>				

Other (please specify)

Dalton Fair Housing Survey and Needs Assessment

39. Please rank the following Housing Needs on a scale ranging from a very low need to a very high need.

	very low need	low need	moderate need	high need	very high need
Down Payment Assistance/1st Time Homebuyer Program	<input type="radio"/>				
Rehabilitation of Current Housing	<input type="radio"/>				
Energy Efficiency Improvements to Current Housing	<input type="radio"/>				
New Home Construction	<input type="radio"/>				
Rehabilitation of Rental Housing	<input type="radio"/>				
Acquisition of Rental Housing Unites	<input type="radio"/>				
Rental Housing New Construction	<input type="radio"/>				
Relocation Assistance for Displaced Persons (Individuals, Families, Businesses, Non-Profits, Organizations, and Farms)	<input type="radio"/>				
Additional Public Housing	<input type="radio"/>				

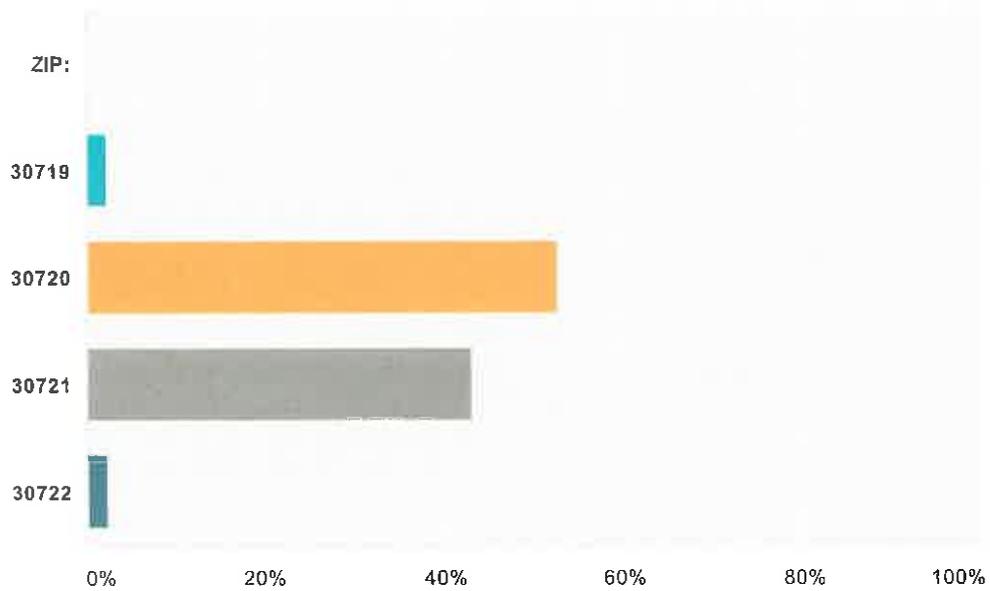
Other (please specify)

Fair Housing Survey Results

Dalton Fair Housing Survey and Needs Assessment

Q1 Please indicate the ZIP Code of your residence

Answered: 42 Skipped: 0

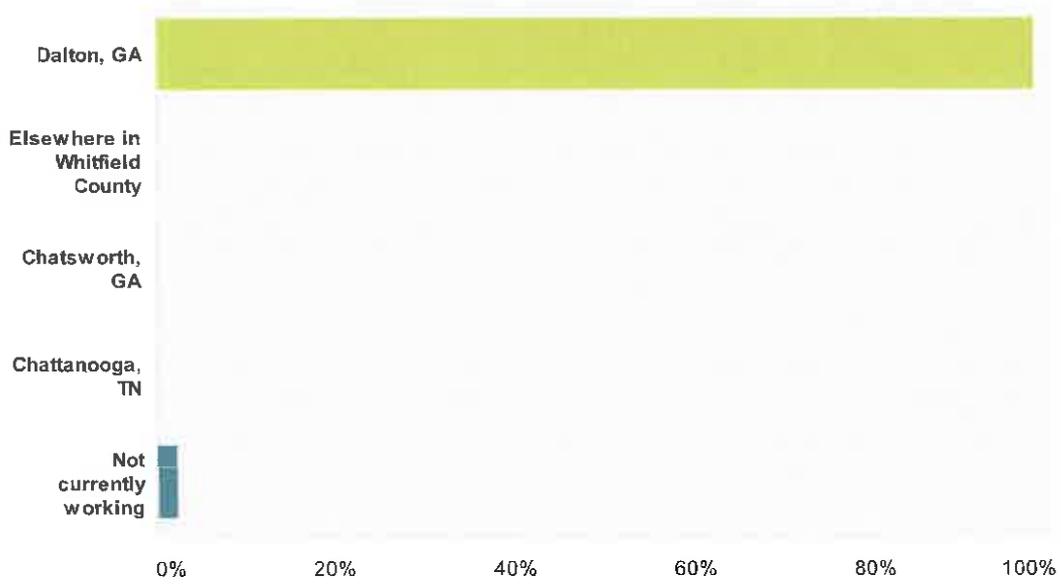


Answer Choices	Responses	
ZIP:	0%	0
30719	2.38%	1
30720	52.38%	22
30721	42.86%	18
30722	2.38%	1
Total		42

Dalton Fair Housing Survey and Needs Assessment

Q2 Where do you work?

Answered: 42 Skipped: 0

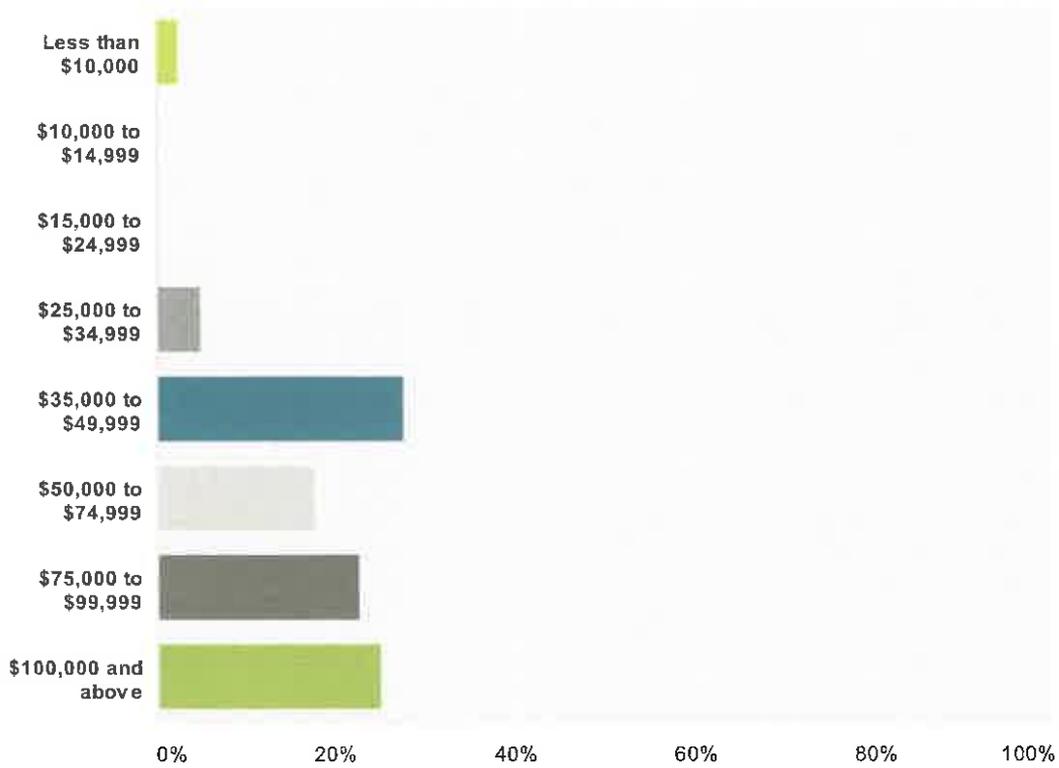


Answer Choices	Responses	
Dalton, GA	97.62%	41
Elsewhere in Whitfield County	0%	0
Chatsworth, GA	0%	0
Chattanooga, TN	0%	0
Not currently working	2.38%	1
Total		42

Dalton Fair Housing Survey and Needs Assessment

Q3 Please SELECT the ONE income range that best describes your household's total income.

Answered: 40 Skipped: 2

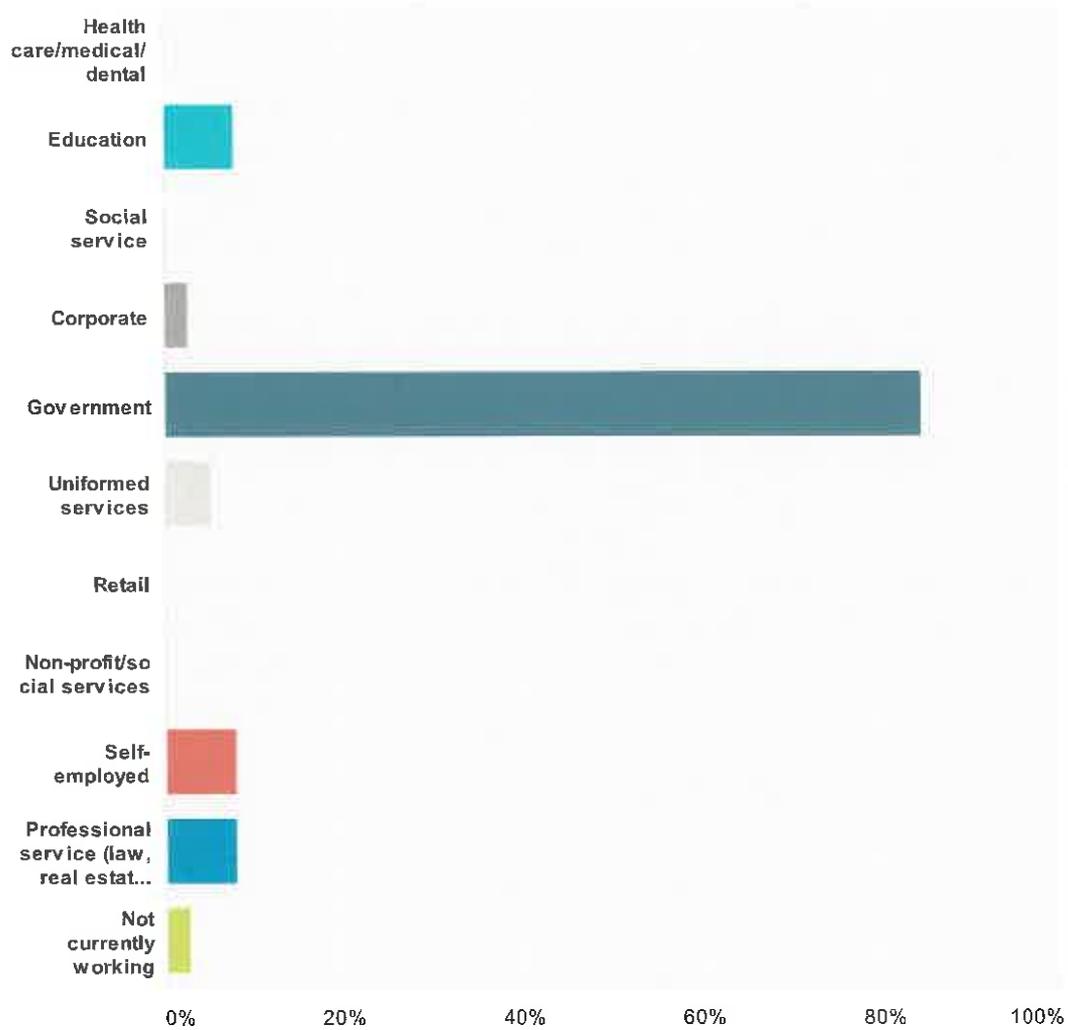


Answer Choices	Responses	
Less than \$10,000	2.50%	1
\$10,000 to \$14,999	0%	0
\$15,000 to \$24,999	0%	0
\$25,000 to \$34,999	5%	2
\$35,000 to \$49,999	27.50%	11
\$50,000 to \$74,999	17.50%	7
\$75,000 to \$99,999	22.50%	9
\$100,000 and above	25%	10
Total		40

Dalton Fair Housing Survey and Needs Assessment

Q4 In which field(s) are you employed?

Answered: 38 Skipped: 4



Answer Choices	Responses
Health care/medical/dental	0% 0
Education	7.89% 3
Social service	0% 0
Corporate	2.63% 1
Government	84.21% 32
Uniformed services	5.26% 2
Retail	0% 0
Non-profit/social services	0% 0
Self-employed	7.89% 3
Professional service (law, real estate, accounting)	7.89% 3
Not currently working	2.63% 1

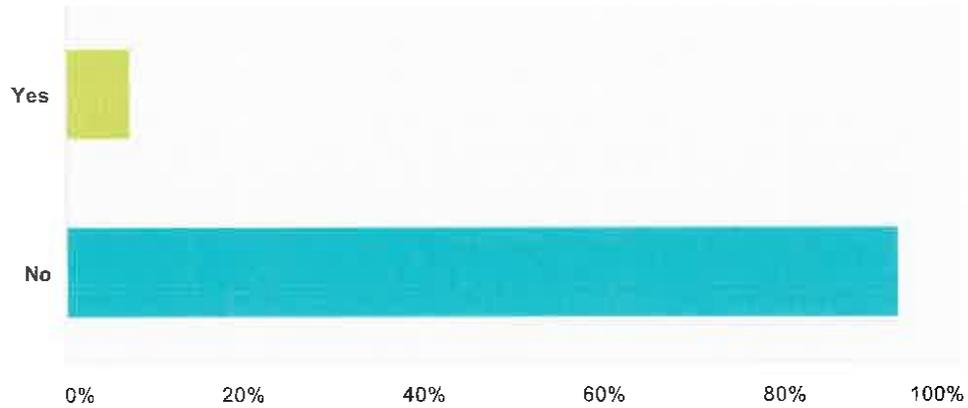
Dalton Fair Housing Survey and Needs Assessment

Total Respondents: 38

Dalton Fair Housing Survey and Needs Assessment

Q5 The U.S. Census Bureau considers the following to be "minority groups": Black or African American, Hispanic or Latino, Asian, Native Hawaiian or Other Pacific Islander, or American Indian or Alaska Native. Are you a member of a minority group listed above?

Answered: 41 Skipped: 1

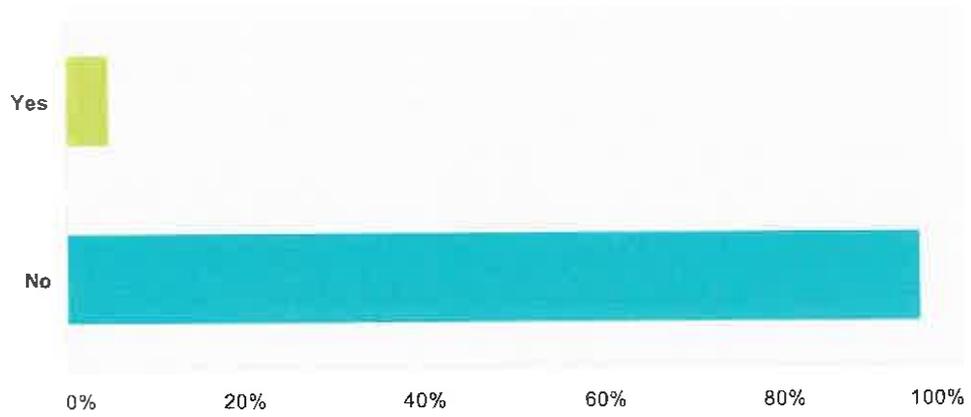


Answer Choices	Responses	
Yes	7.32%	3
No	92.68%	38
Total		41

Dalton Fair Housing Survey and Needs Assessment

Q6 Is a language other than English spoken regularly in your household?

Answered: 40 Skipped: 2

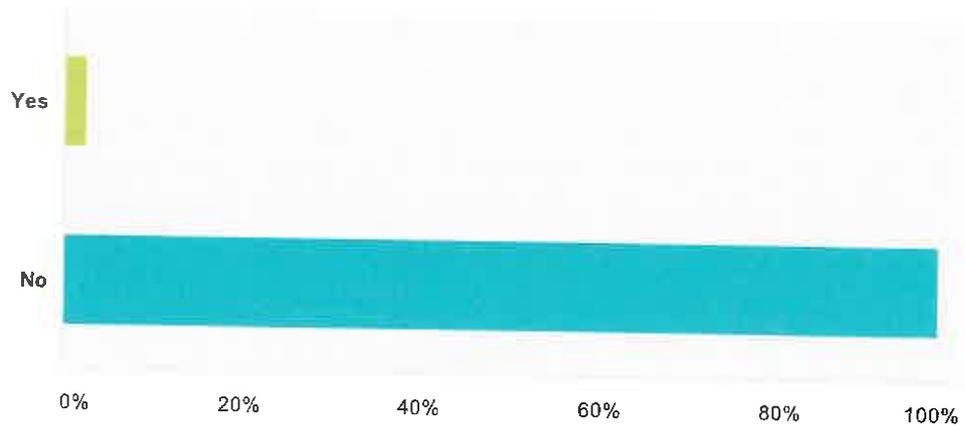


Answer Choices	Responses	
Yes	5%	2
No	95%	38
Total		40

Dalton Fair Housing Survey and Needs Assessment

Q7 Does anyone in your household have a disability?

Answered: 40 Skipped: 0

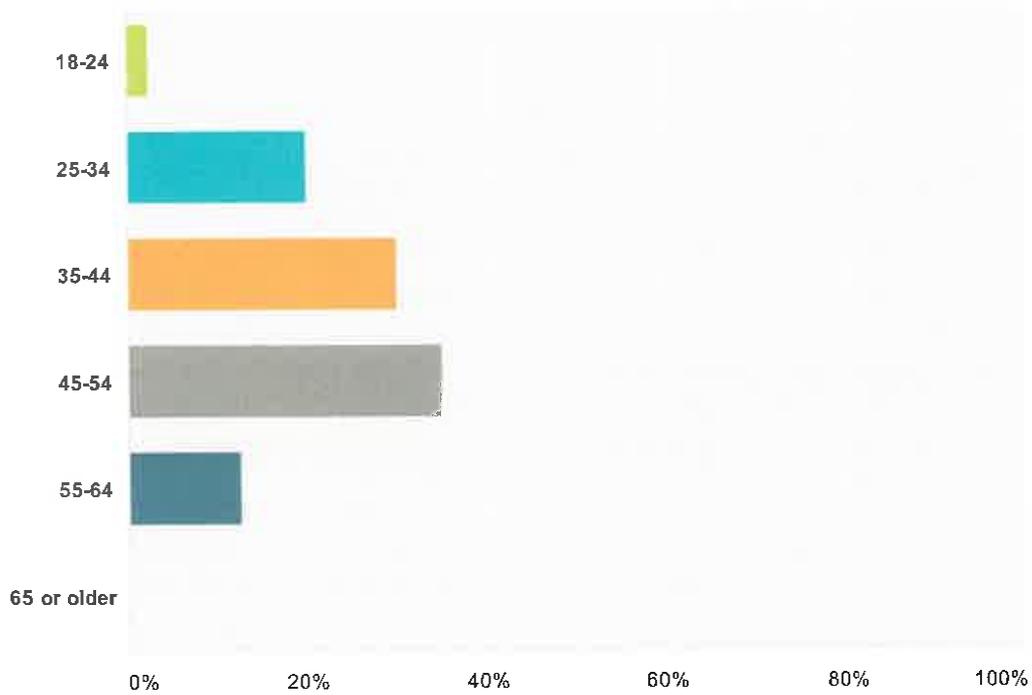


Answer Choices	Responses	
Yes	2.50%	1
No	97.50%	39
Total		40

Dalton Fair Housing Survey and Needs Assessment

Q8 Which is your age group?

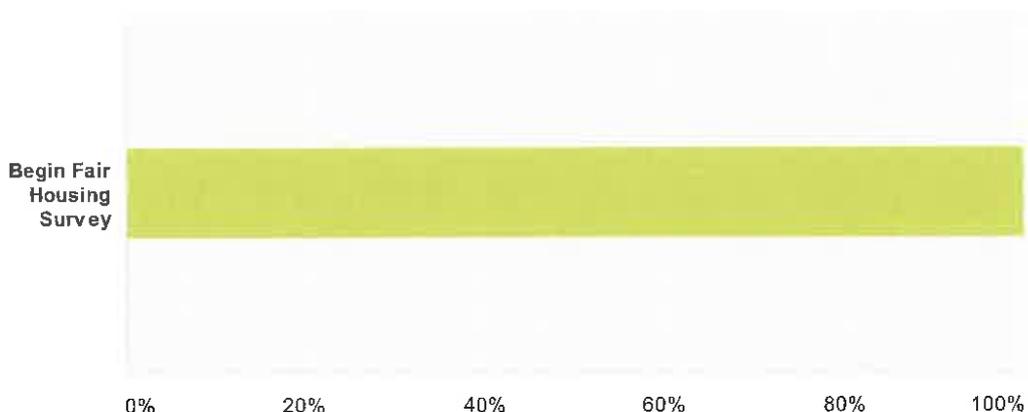
Answered: 40 Skipped: 2



Answer Choices	Responses	
18-24	2.50%	1
25-34	20%	8
35-44	30%	12
45-54	35%	14
55-64	12.50%	5
65 or older	0%	0
Total		40

Q9 DALTON, GA SURVEY ON FAIR HOUSING This section of the survey is part of the process of developing an "Analysis of Impediments to Fair Housing Choice" (AI). The AI is a document required by the U.S. Department of Housing and Urban Development (HUD) related to the local receipt of federal funds. Its purpose is to identify barriers to people having equal choice in housing and identify actions that can be taken to overcome those barriers. Part of the process involves hearing from members of the public on issues of fair housing and housing choice. The questions on the following pages are intended to serve that purpose. Please only participate in this survey if you are, or have been, a resident of Dalton. Your responses will be kept strictly confidential. We will only report this information in combination with the other survey responses and in summary format to protect your privacy. Please do not place your name or other identifying information anywhere on the survey. You have right to discontinue participation at any time without loss of benefits otherwise afforded to you. If you have questions about the use of the survey information, please call WFN Consulting at 770-420-5634.

Answered: 35 Skipped: 7



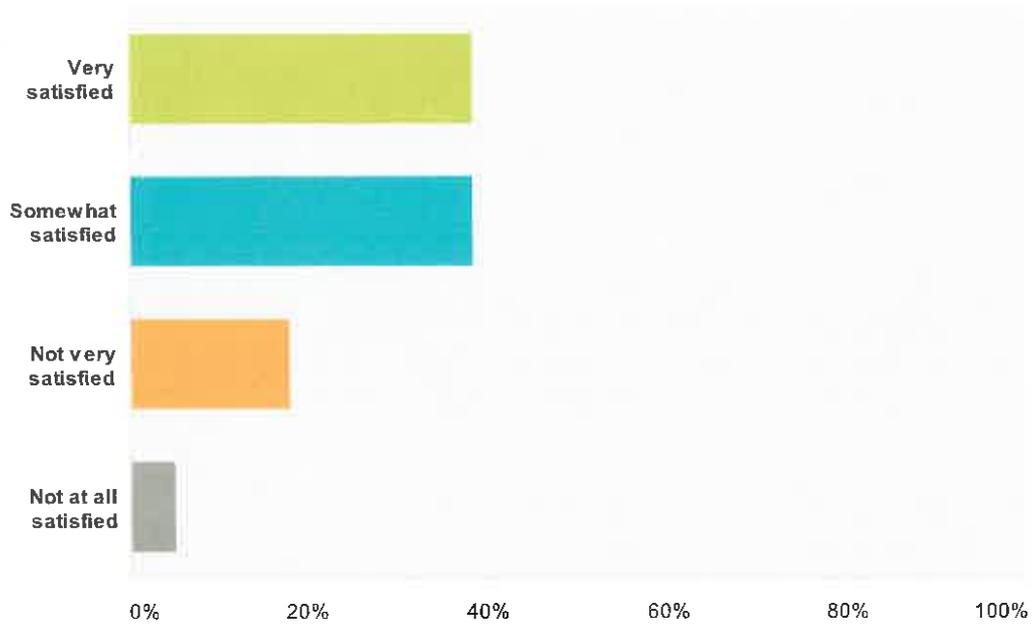
Dalton Fair Housing Survey and Needs Assessment

Begin Fair Housing Survey	100%	35
Total		35

Dalton Fair Housing Survey and Needs Assessment

Q10 Thinking about your current living situation, how satisfied would you say you are?

Answered: 39 Skipped: 3

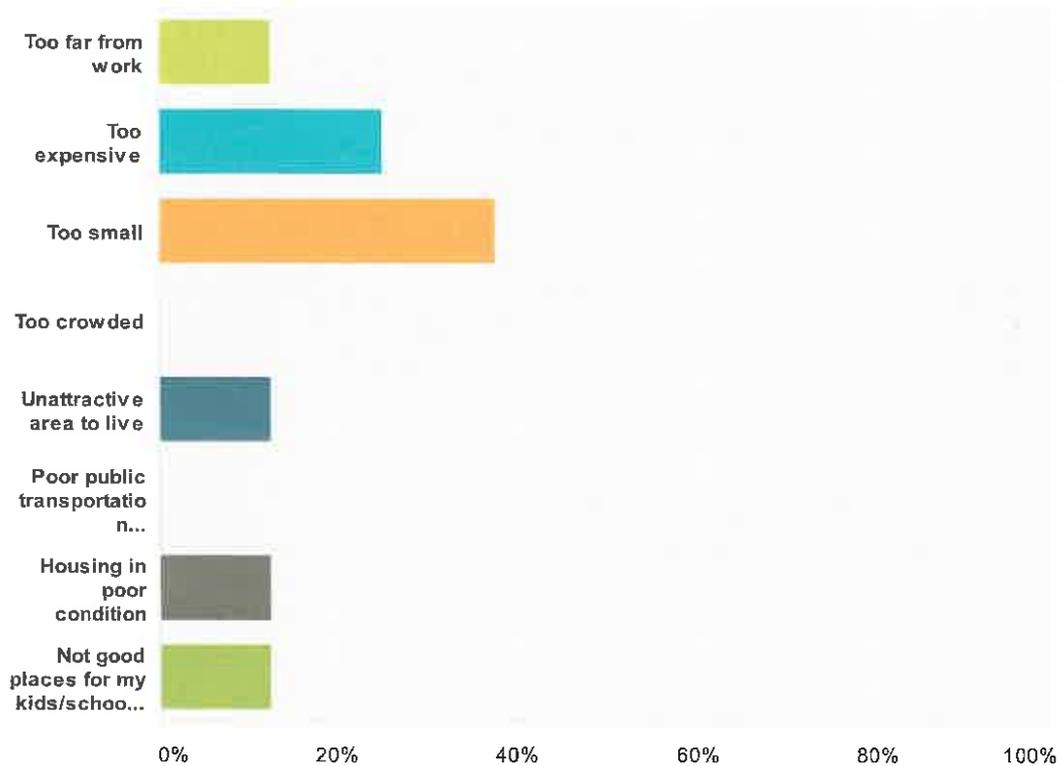


Answer Choices	Responses	
Very satisfied	38.46%	15
Somewhat satisfied	38.46%	15
Not very satisfied	17.95%	7
Not at all satisfied	5.13%	2
Total		39

Dalton Fair Housing Survey and Needs Assessment

Q11 If you are not satisfied with your current living situation, what is the primary reason for your dissatisfaction?

Answered: 8 Skipped: 34

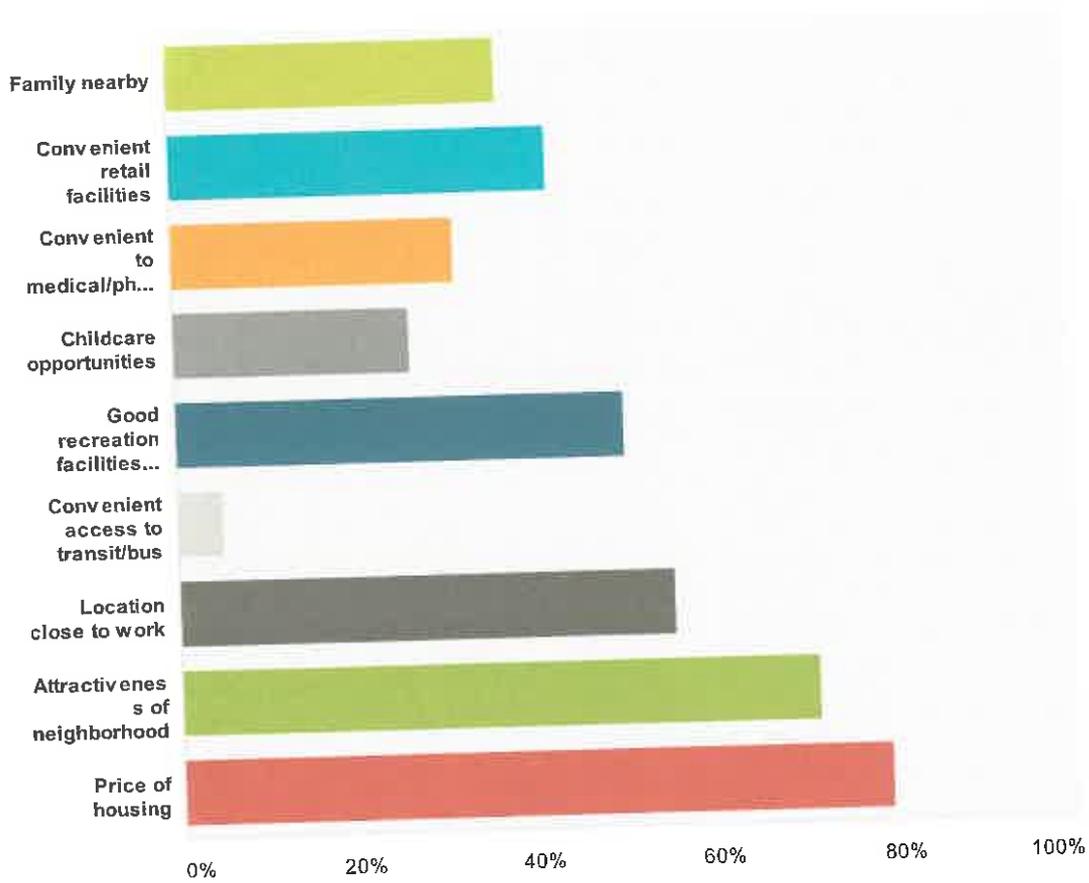


Answer Choices	Responses
Too far from work	12.50% 1
Too expensive	25% 2
Too small	37.50% 3
Too crowded	0% 0
Unattractive area to live	12.50% 1
Poor public transportation opportunities	0% 0
Housing in poor condition	12.50% 1
Not good places for my kids/schools are not good in the area	12.50% 1
Total Respondents: 8	

Dalton Fair Housing Survey and Needs Assessment

Q12 Which of the following are important considerations to you in choosing a place to live? (SELECT ALL THAT APPLY)

Answered: 38 Skipped: 4

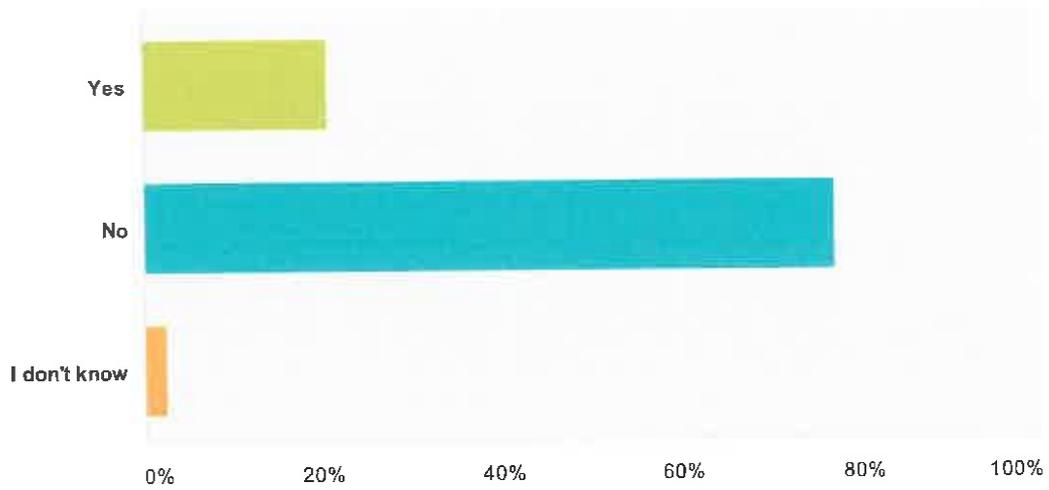


Answer Choices	Responses	Count
Family nearby	36.84%	14
Convenient retail facilities	42.11%	16
Convenient to medical/pharmacy	31.58%	12
Childcare opportunities	26.32%	10
Good recreation facilities (parks, trails, playgrounds, ball courts)	50%	19
Convenient access to transit/bus	5.26%	2
Location close to work	55.26%	21
Attractiveness of neighborhood	71.05%	27
Price of housing	78.95%	30
Total Respondents: 38		

Dalton Fair Housing Survey and Needs Assessment

Q13 Have you or someone in your household purchased or leased a residence in Dalton in the past year?

Answered: 39 Skipped: 3

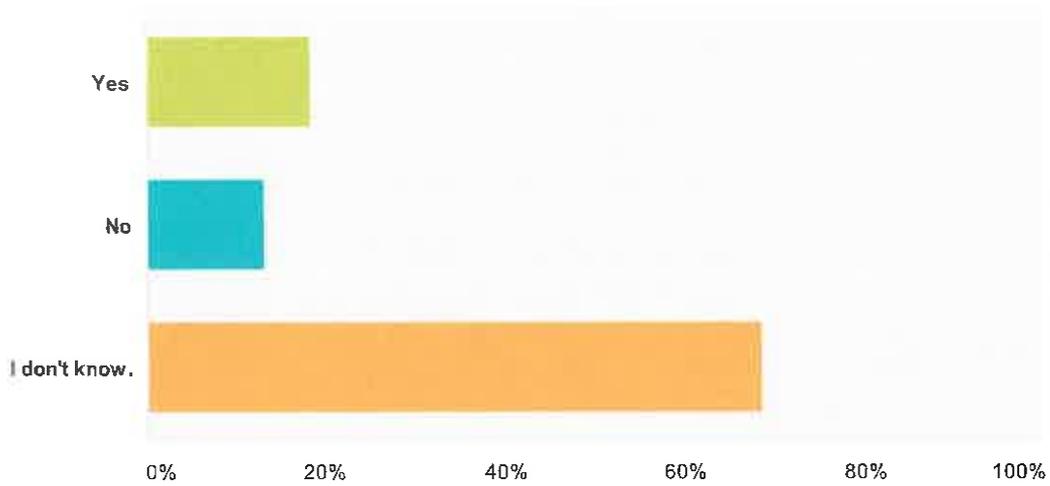


Answer Choices	Responses	
Yes	20.51%	8
No	76.92%	30
I don't know	2.56%	1
Total		39

Dalton Fair Housing Survey and Needs Assessment

Q14 Is there sufficient housing in Dalton for persons with disabilities?

Answered: 38 Skipped: 4

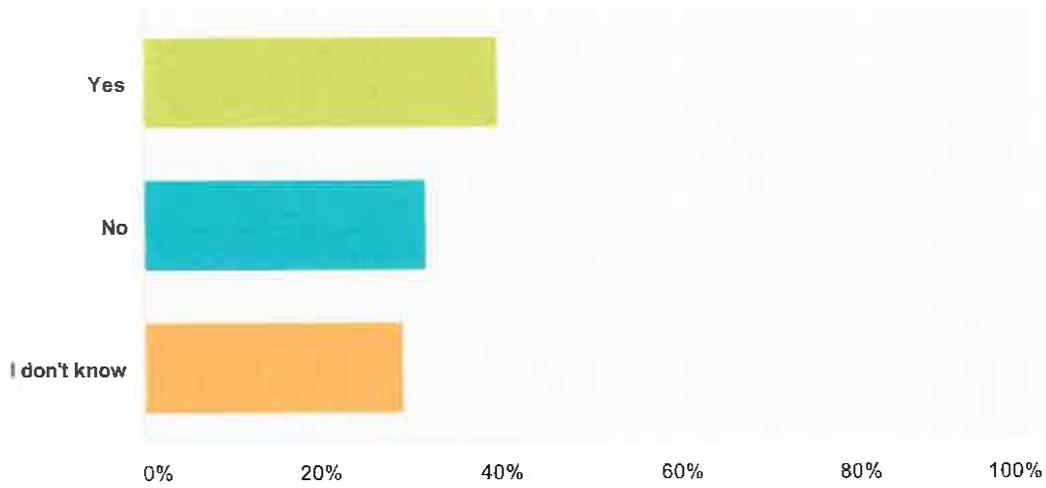


Answer Choices	Responses	
Yes	18.42%	7
No	13.16%	5
I don't know.	68.42%	26
Total		38

Dalton Fair Housing Survey and Needs Assessment

Q15 Is there sufficient housing in Dalton for low to moderate-income persons?

Answered: 38 Skipped: 4

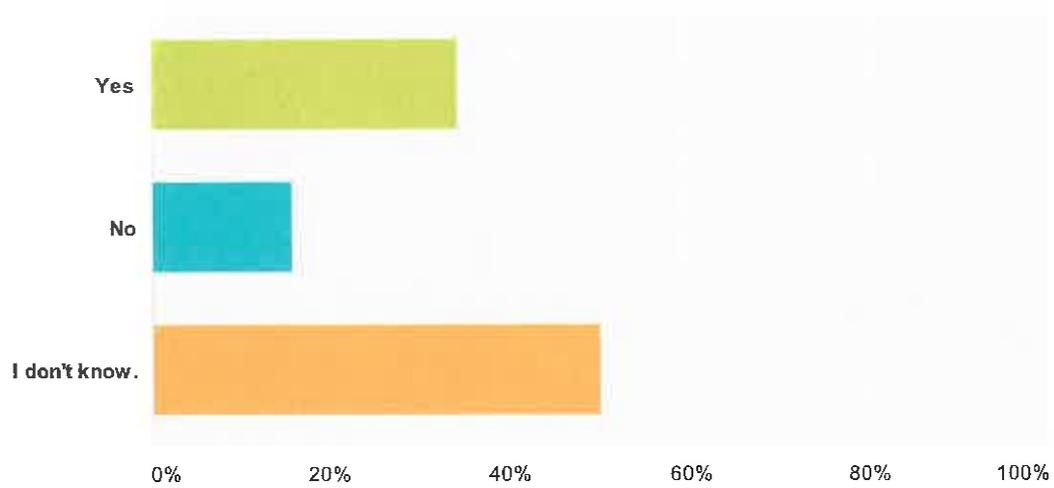


Answer Choices	Responses	
Yes	39.47%	15
No	31.58%	12
I don't know	28.95%	11
Total		38

Dalton Fair Housing Survey and Needs Assessment

Q16 Is there is an adequate supply of Section 8 rentals/homes available in Dalton?

Answered: 38 Skipped: 4

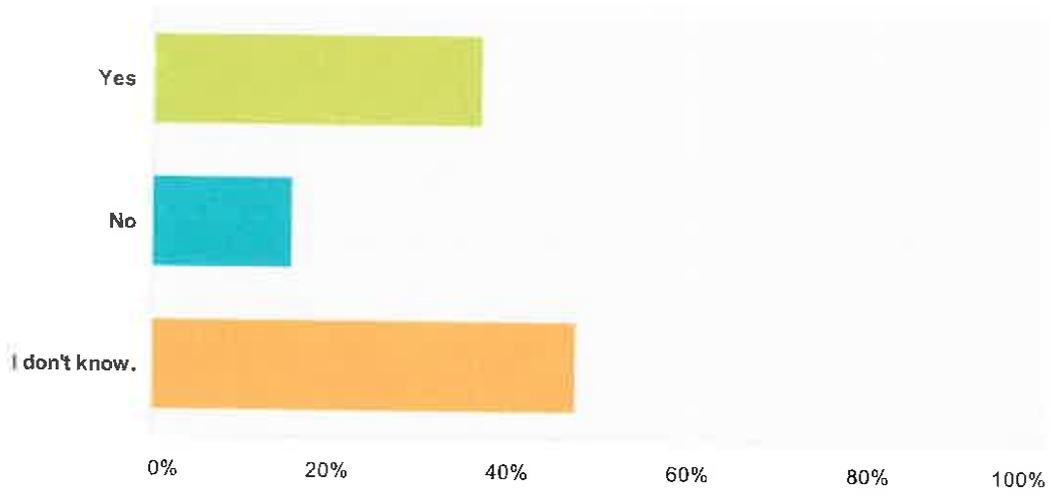


Answer Choices	Responses	
Yes	34.21%	13
No	15.79%	6
I don't know.	50%	19
Total		38

Dalton Fair Housing Survey and Needs Assessment

Q17 Is there sufficient housing in Dalton for the elderly?

Answered: 38 Skipped: 4

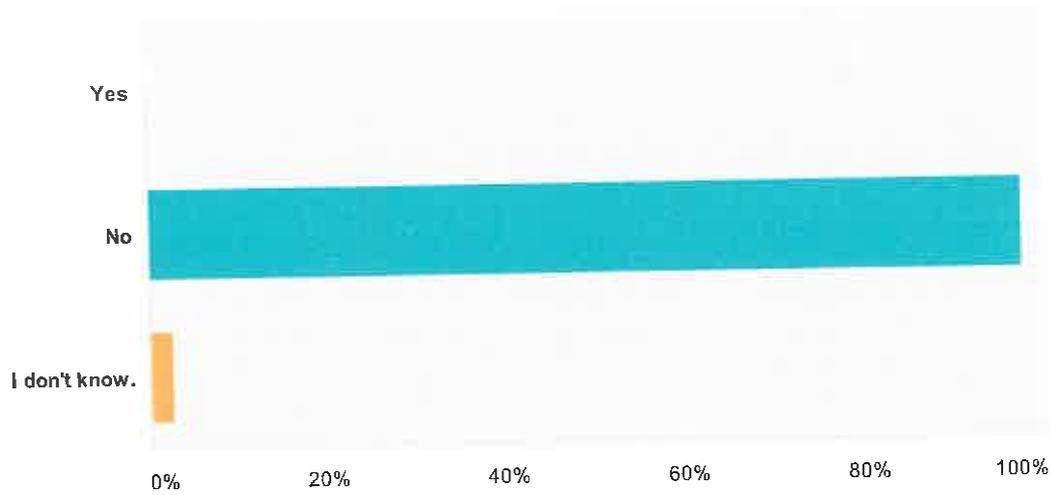


Answer Choices	Responses	
Yes	36.84%	14
No	15.79%	6
I don't know.	47.37%	18
Total		38

Dalton Fair Housing Survey and Needs Assessment

Q18 Do you currently live in public housing or receive Section 8 rental assistance?

Answered: 38 Skipped: 4

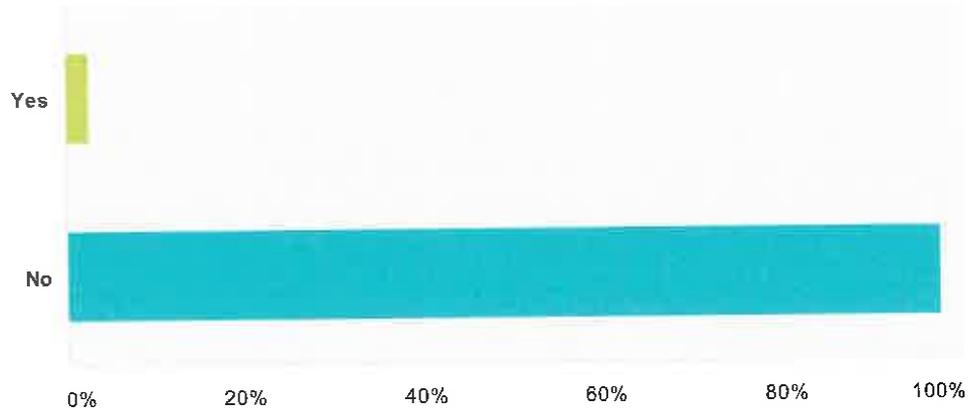


Answer Choices	Responses
Yes	0%
No	97.37%
I don't know.	2.63%
Total	38

Dalton Fair Housing Survey and Needs Assessment

Q19 Would the availability of multi-lingual real estate brokers and mortgage brokers help in your considering a move to or within Dalton?

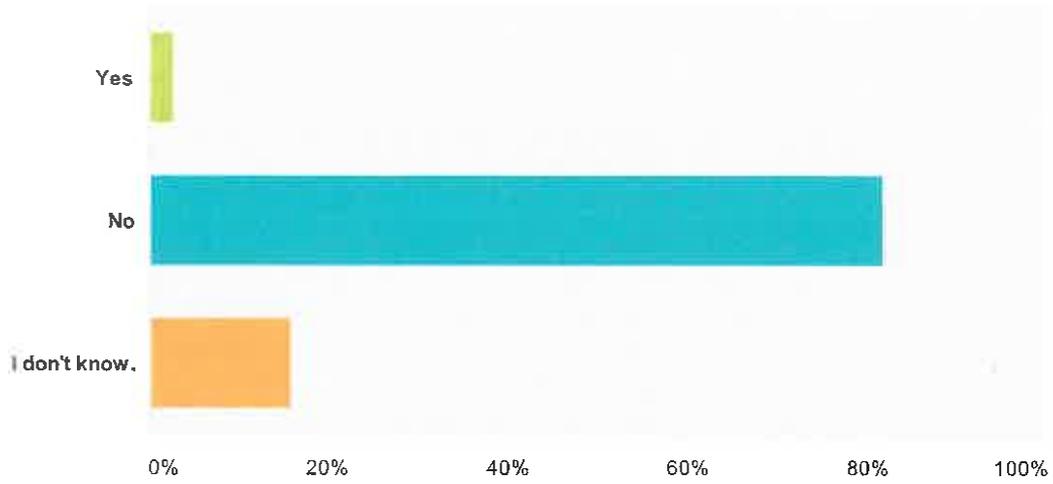
Answered: 38 Skipped: 4



Answer Choices	Responses	
Yes	2.63%	1
No	97.37%	37
Total		38

Q20 Is Public Transportation to major employers available in your area?

Answered: 38 Skipped: 4

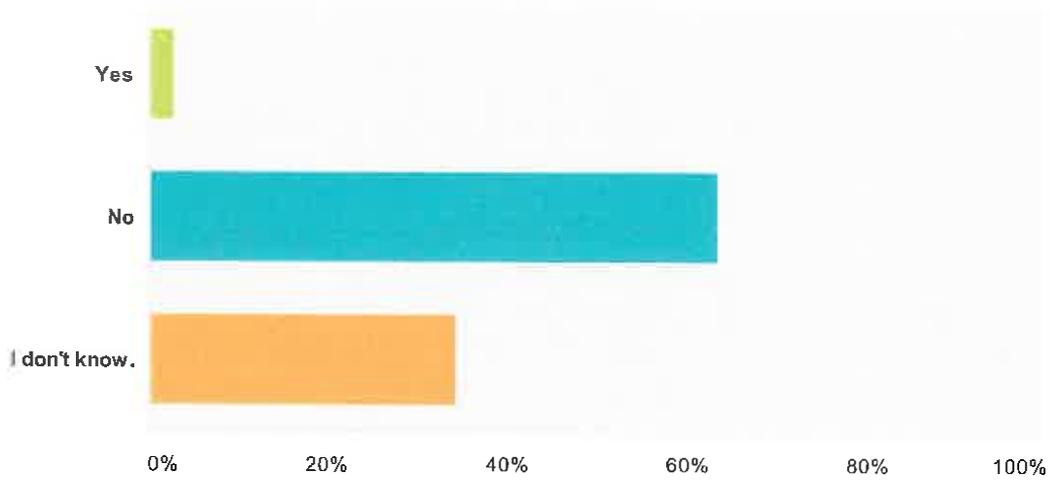


Answer Choices	Responses
Yes	2.63% 1
No	81.58% 31
I don't know.	15.79% 6
Total	38

Dalton Fair Housing Survey and Needs Assessment

Q21 Does Public Transportation service coincide with work schedules at your place of employment?

Answered: 38 Skipped: 4

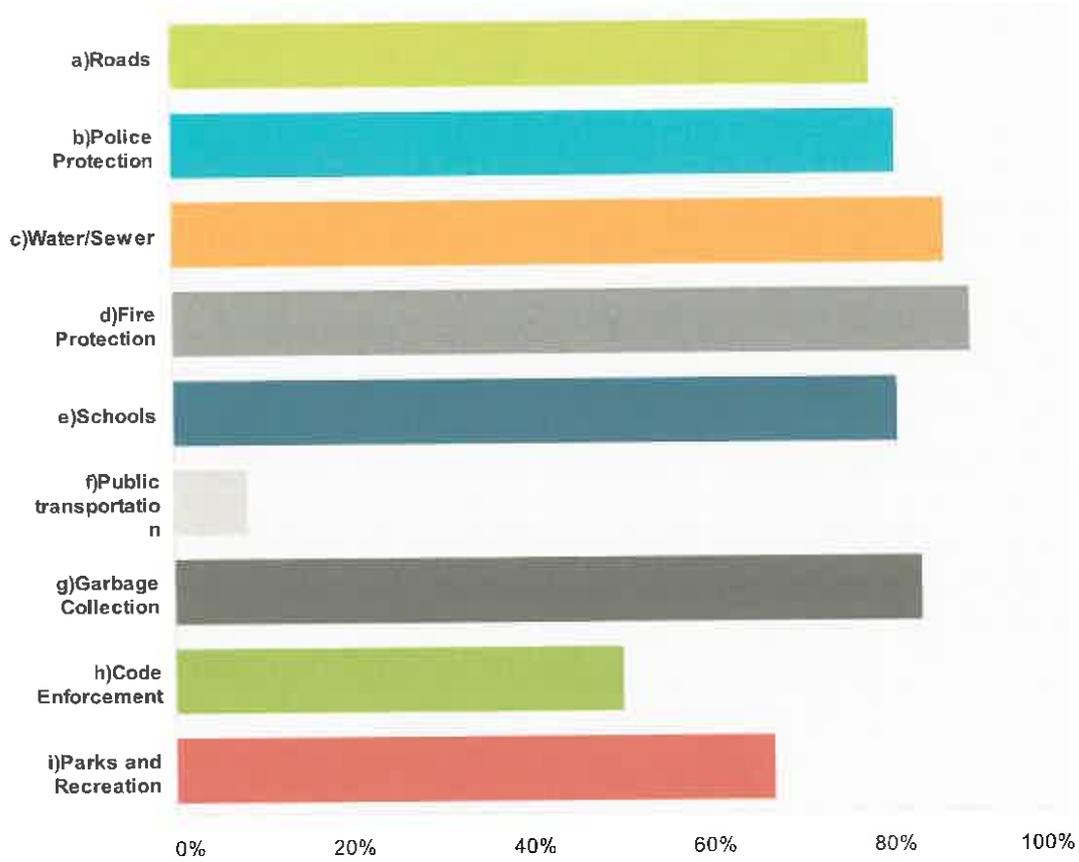


Answer Choices	Responses
Yes	2.63% 1
No	63.16% 24
I don't know.	34.21% 13
Total	38

Dalton Fair Housing Survey and Needs Assessment

Q22 Thinking about the following public services provided within the City, which do you feel are provided EQUALLY across all neighborhoods? (SELECT ALL THAT APPLY)

Answered: 36 Skipped: 6

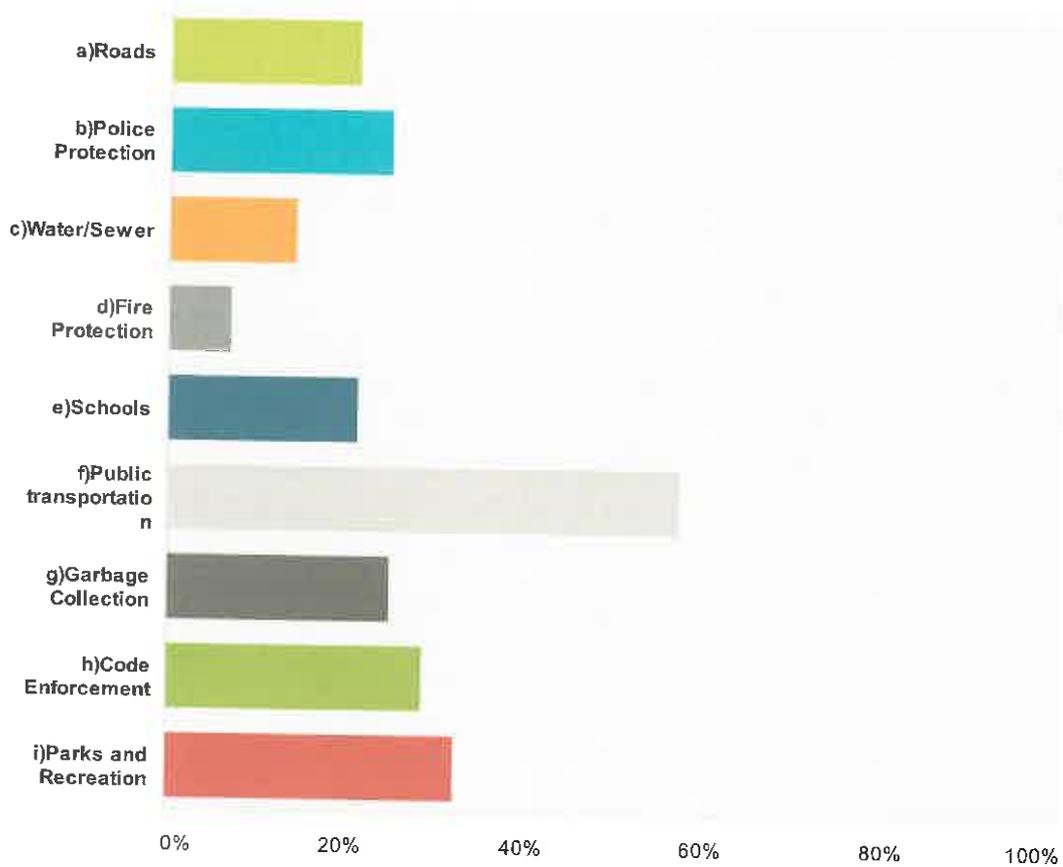


Answer Choices	Responses	
a) Roads	77.78%	28
b) Police Protection	80.56%	29
c) Water/Sewer	86.11%	31
d) Fire Protection	88.89%	32
e) Schools	80.56%	29
f) Public transportation	8.33%	3
g) Garbage Collection	83.33%	30
h) Code Enforcement	50%	18
i) Parks and Recreation	66.67%	24
Total Respondents: 36		

Dalton Fair Housing Survey and Needs Assessment

Q23 Which of the following public services are NOT EQUALLY provided from one neighborhood to another? (SELECT ALL THAT APPLY)

Answered: 28 Skipped: 14

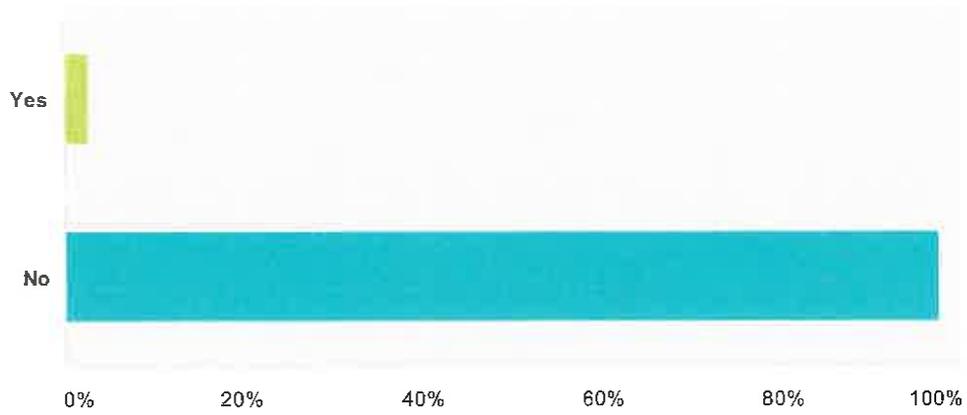


Answer Choices	Responses	
a)Roads	21.43%	6
b)Police Protection	25%	7
c)Water/Sewer	14.29%	4
d)Fire Protection	7.14%	2
e)Schools	21.43%	6
f)Public transportation	57.14%	16
g)Garbage Collection	25%	7
h)Code Enforcement	28.57%	8
i)Parks and Recreation	32.14%	9
Total Respondents: 28		

Dalton Fair Housing Survey and Needs Assessment

Q24 Since living in Dalton, have you ever experienced housing discrimination?

Answered: 36 Skipped: 6

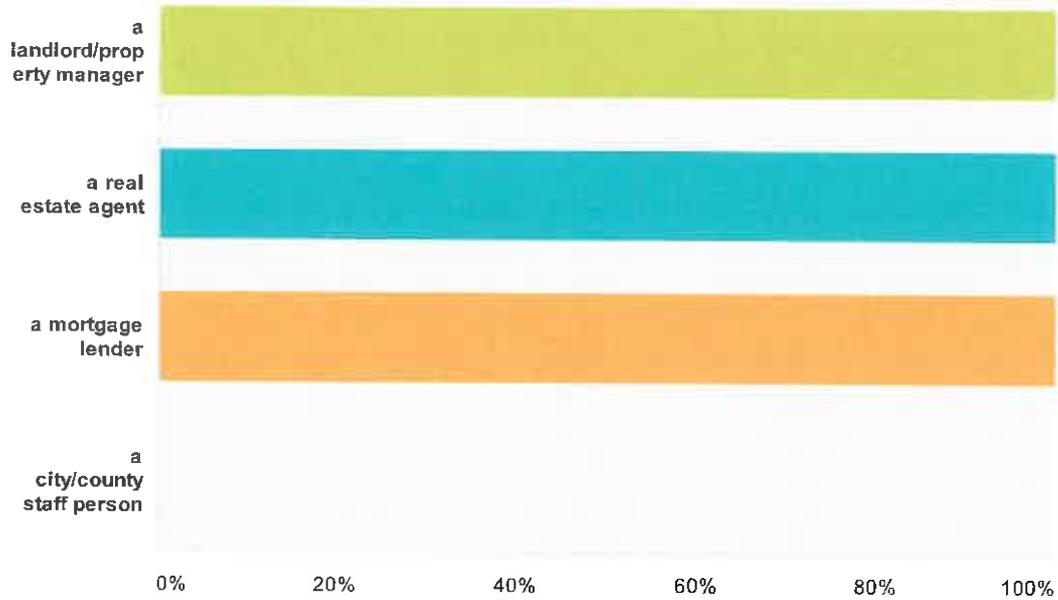


Answer Choices	Responses	
Yes	2.78%	1
No	97.22%	35
Total		36

Dalton Fair Housing Survey and Needs Assessment

Q25 If you answered yes to question 18, who discriminated against you?(CHECK ALL THAT APPLY)

Answered: 1 Skipped: 41

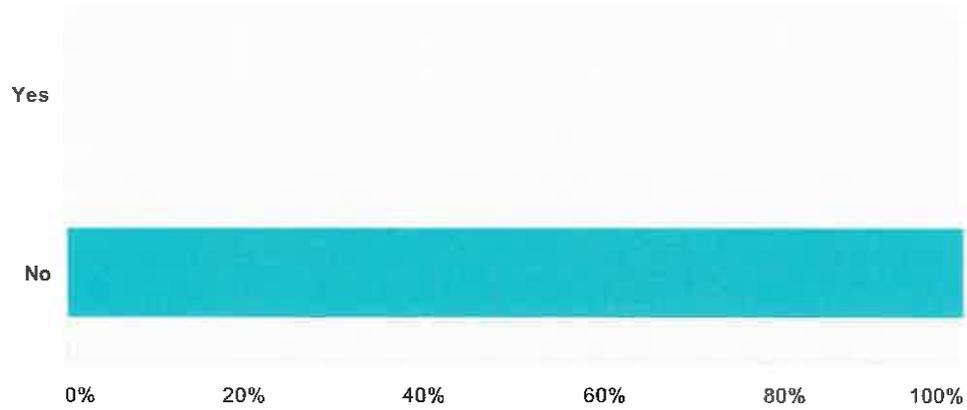


Answer Choices	Responses	
a landlord/property manager	100%	1
a real estate agent	100%	1
a mortgage lender	100%	1
a city/county staff person	0%	0
Total Respondents: 1		

Dalton Fair Housing Survey and Needs Assessment

Q26 Based on your response reporting that you have experienced discrimination, did you file a report of that discrimination?

Answered: 1 Skipped: 41

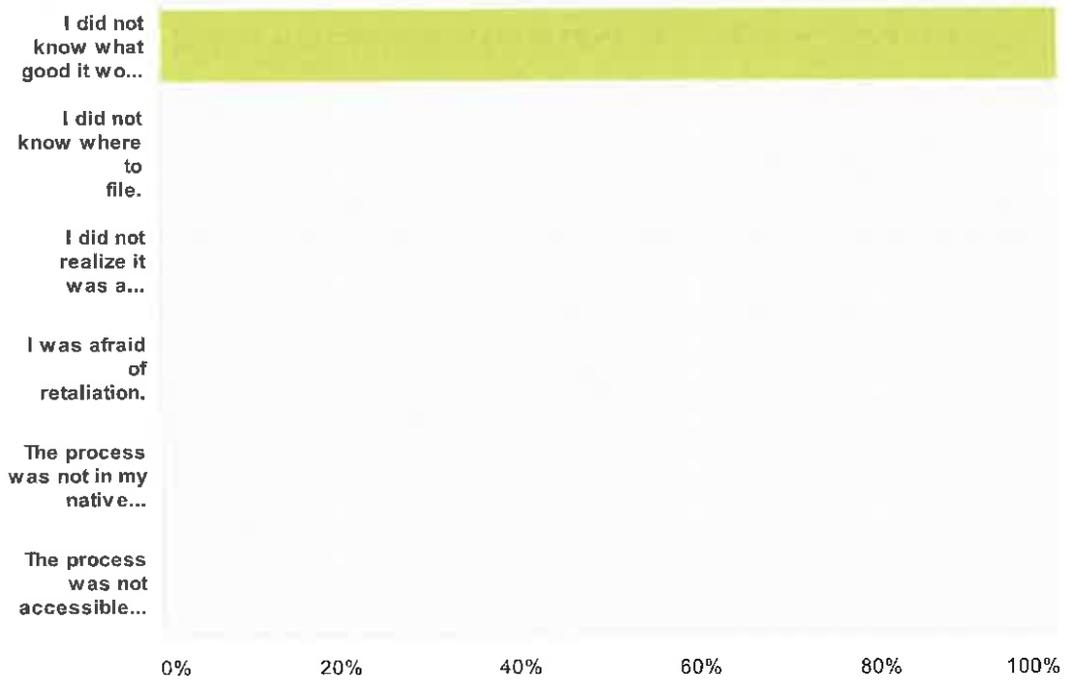


Answer Choices	Responses	
Yes	0%	0
No	100%	1
Total		1

Dalton Fair Housing Survey and Needs Assessment

Q27 If you answered NO, why didn't you file? (SELECT ONLY ONE)

Answered: 1 Skipped: 4

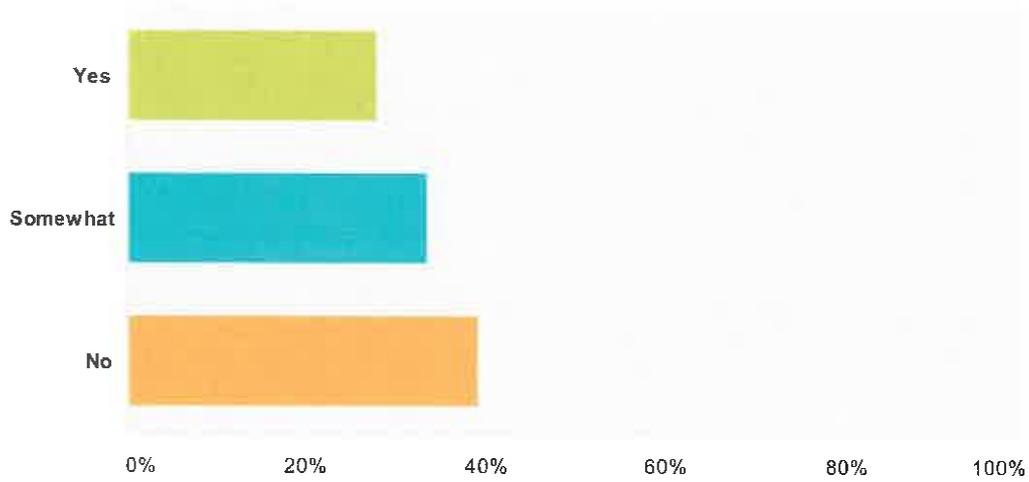


Answer Choices	Responses	
I did not know what good it would do.	100%	1
I did not know where to file.	0%	0
I did not realize it was a violation of the law.	0%	0
I was afraid of retaliation.	0%	0
The process was not in my native language.	0%	0
The process was not accessible to me because of a disability.	0%	0
Total		1

Dalton Fair Housing Survey and Needs Assessment

Q28 Do you know your Fair Housing Rights? (PLEASE SELECT ONE RESPONSE)

Answered: 36 Skipped: 6

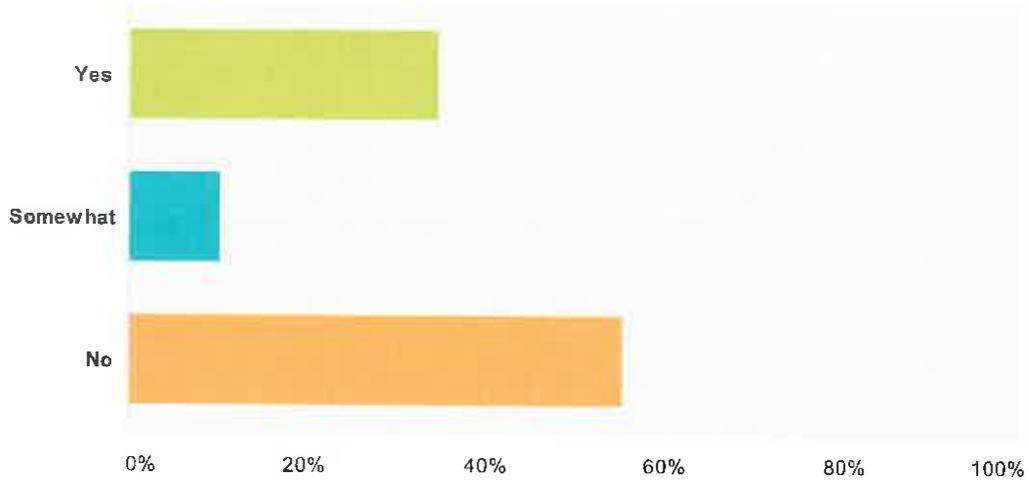


Answer Choices	Responses	
Yes	27.78%	10
Somewhat	33.33%	12
No	38.89%	14
Total		36

Dalton Fair Housing Survey and Needs Assessment

Q29 Do you know where to file a housing discrimination complaint?

Answered: 29 Skipped: 13

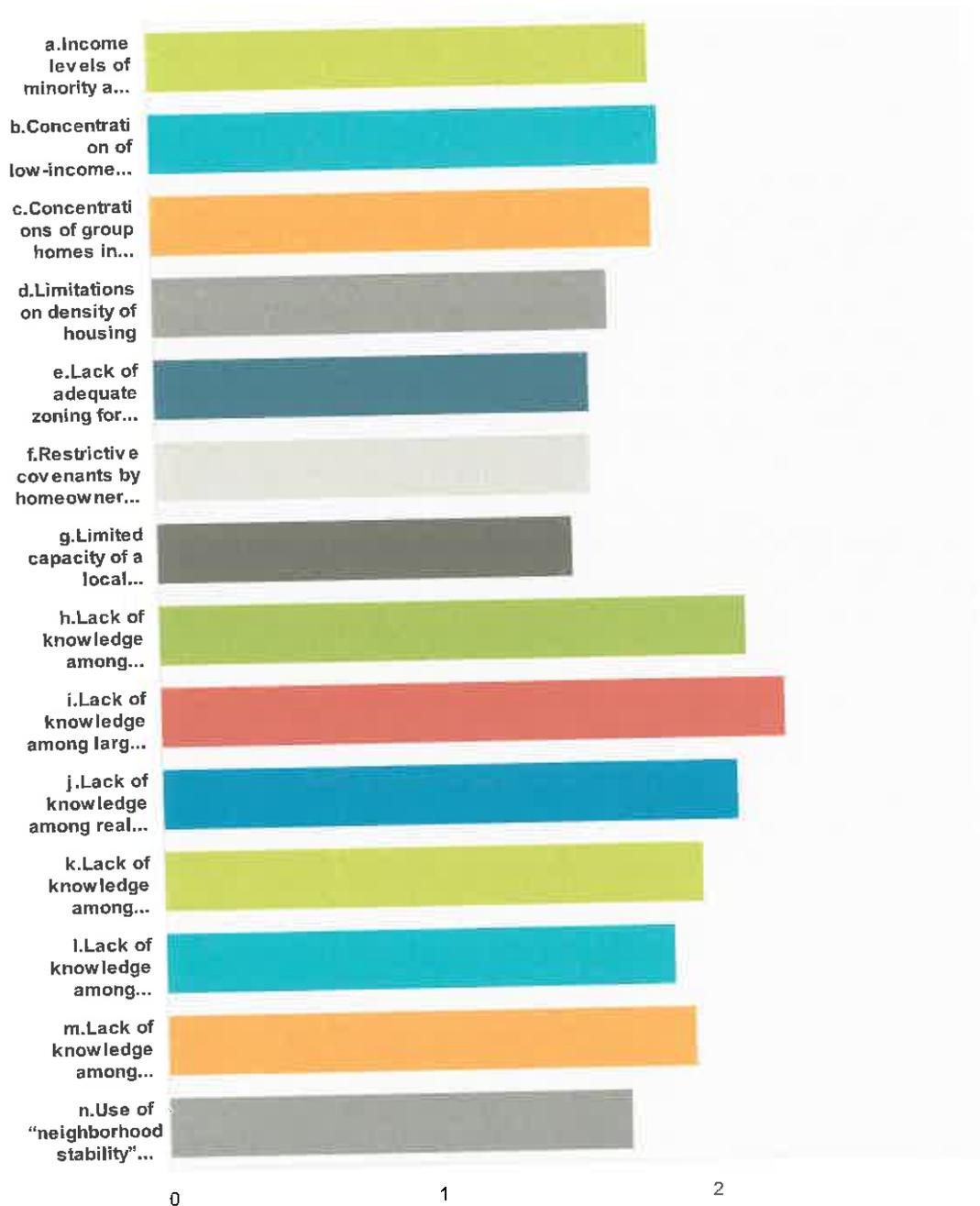


Answer Choices	Responses
Yes	34.48% 10
Somewhat	10.34% 3
No	55.17% 16
Total	29

Dalton Fair Housing Survey and Needs Assessment

Q30 Please evaluate the following possible barriers to fair housing for you and your neighbors on a scale of 1 to 4, (1=not a barrier, 2=a minor barrier, 3=a modest barrier, 4=a serious barrier). PLEASE SELECT ONLY ONE RESPONSE FOR EACH BARRIER.

Answered: 29 Skipped: 13



	Not A BARRIER	MINOR BARRIER	MODEST BARRIER	SERIOUS BARRIER	Total	Average Rating
a. Income levels of minority and female-headed households	48.28%	31.03%	10.34%	10.34%	29	1.75

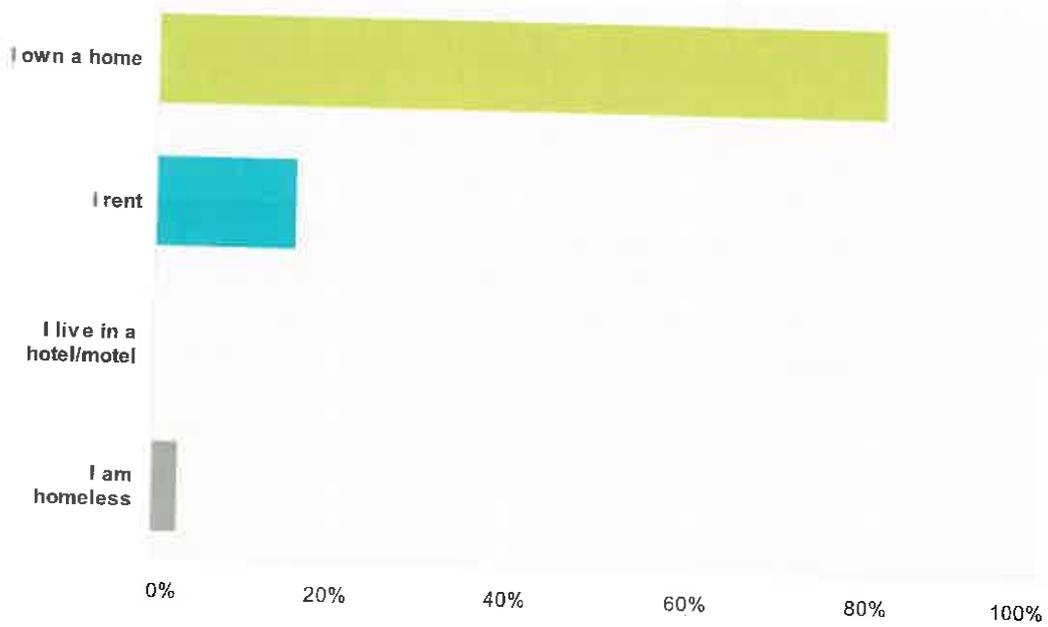
Dalton Fair Housing Survey and Needs Assessment

	14	9	3	3	29	1.83
b. Concentration of low-income housing in certain areas	44.83% 13	31.03% 9	17.24% 5	6.90% 2	29	1.86
c. Concentrations of group homes in certain neighborhoods	48.28% 14	24.14% 7	24.14% 7	3.45% 1	29	1.83
d. Limitations on density of housing	51.72% 15	31.03% 9	17.24% 5	0% 0	29	1.66
e. Lack of adequate zoning for manufactured housing	58.62% 17	24.14% 7	17.24% 5	0% 0	29	1.59
f. Restrictive covenants by homeowner associations or neighborhood organizations	58.62% 17	24.14% 7	17.24% 5	0% 0	29	1.59
g. Limited capacity of a local organization devoted to fair housing investigation/testing	62.07% 18	24.14% 7	13.79% 4	0% 0	29	1.52
h. Lack of knowledge among residents regarding fair housing	37.93% 11	27.59% 8	17.24% 5	17.24% 5	29	2.14
i. Lack of knowledge among large landlords/property managers regarding fair housing	34.48% 10	20.69% 6	27.59% 8	17.24% 5	29	2.28
j. Lack of knowledge among real estate agents regarding fair housing	41.38% 12	17.24% 5	31.03% 9	10.34% 3	29	2.10
k. Lack of knowledge among bankers/lenders regarding fair housing	44.83% 13	24.14% 7	20.69% 6	10.34% 3	29	1.97
l. Lack of knowledge among insurance industry representatives regarding fair housing	50% 14	25% 7	14.29% 4	10.71% 3	28	1.86
m. Lack of knowledge among appraisers regarding fair housing	44.83% 13	27.59% 8	17.24% 5	10.34% 3	29	1.93
n. Use of "neighborhood stability" or similar factors as proxies for racial in makeup appraisals	58.62% 17	17.24% 5	20.69% 6	3.45% 1	29	1.69

Dalton Fair Housing Survey and Needs Assessment

Q31 What is your current housing status?

Answered: 32 Skipped: 10

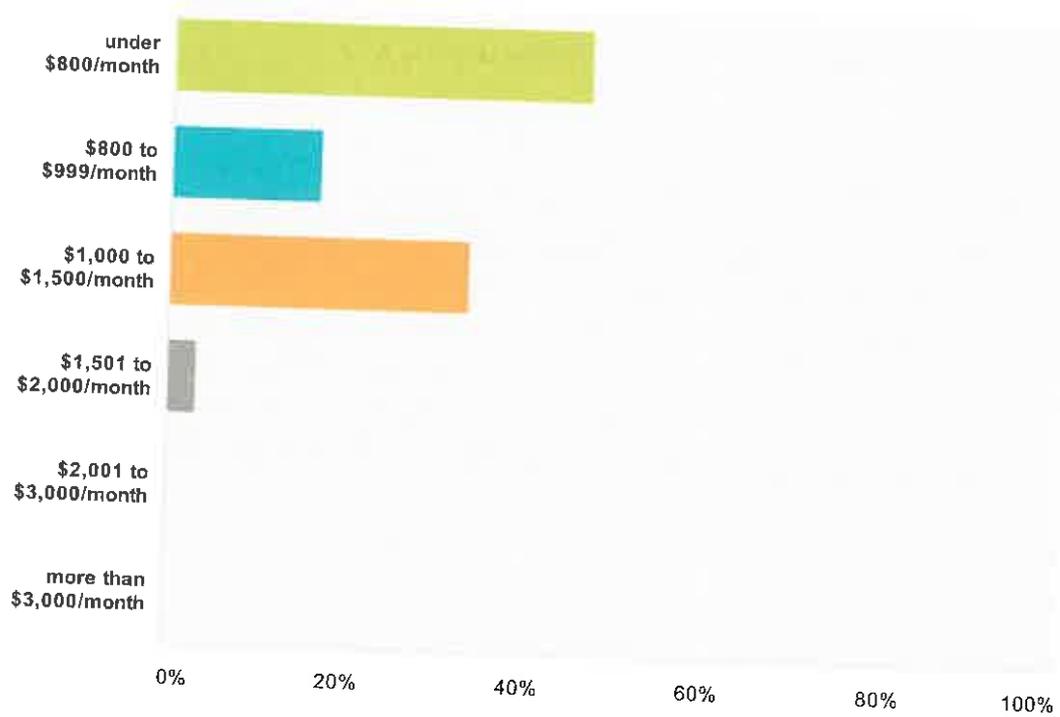


Answer Choices	Responses	
I own a home	81.25%	26
I rent	15.63%	5
I live in a hotel/motel	0%	0
I am homeless	3.13%	1
Total		32

Dalton Fair Housing Survey and Needs Assessment

Q32 How much do you currently pay in rent or mortgage payment per month?

Answered: 30 Skipped: 12

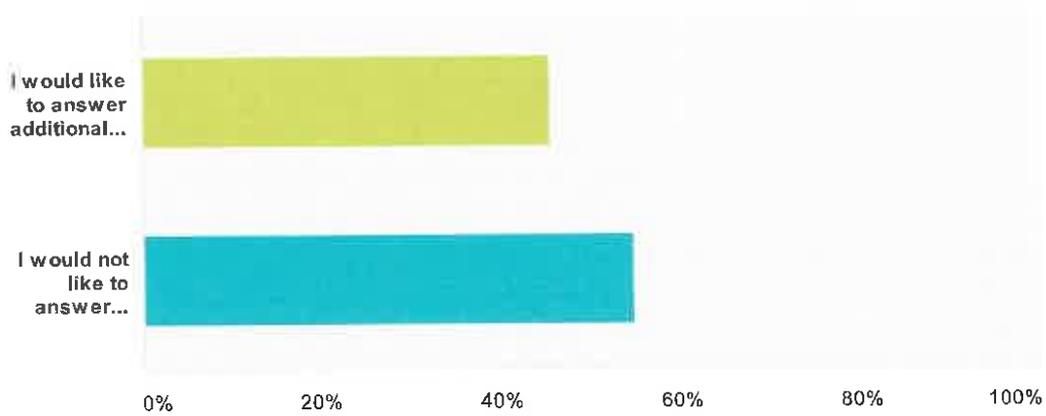


Answer Choices	Responses	
under \$800/month	46.67%	14
\$800 to \$999/month	16.67%	5
\$1,000 to \$1,500/month	33.33%	10
\$1,501 to \$2,000/month	3.33%	1
\$2,001 to \$3,000/month	0%	0
more than \$3,000/month	0%	0
Total		30

Dalton Fair Housing Survey and Needs Assessment

Q33 Please select from the following two choices below:

Answered: 33 Skipped: 9



Answer Choices	Responses	
I would like to answer additional questions regarding needs in my community.	45.45%	15
I would not like to answer additional questions regarding needs in my community.	54.55%	18
Total		33

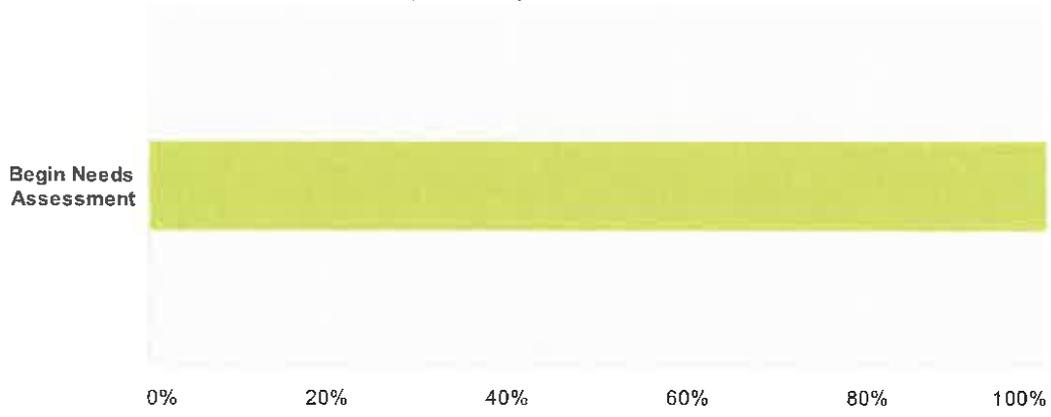
Dalton Fair Housing Survey and Needs Assessment

Q34 Consolidated Plan Needs Assessment

This section of the survey is a needs assessment for the City of Dalton. Every 5 years, the CDBG Program Office will prepare a long range plan for submission to the United States Department of Housing and Urban Development (HUD), which must cover any housing, community development, and homeless needs that might be addressed through the investment of HUD grant funds and other resources during the period of the plan. Submission of the plan to HUD is required to permit the City of Dalton to receive grant funds from HUD. The City of Dalton is inviting individuals and organizations to assist with the identification of needs for inclusion in the Consolidated Plan for 2014-2019. One vehicle being used to receive input from the community is the following Needs Assessment Survey. Your participation is important and we encourage your response to the survey so that any needs you identify can be included in the Consolidated Plan. This is an electronic document that may be submitted through the SurveyMonkey system. However, as an additional method, you may print the survey out and return via mail to the following address: Brittany Cagle City of Dalton CDBG Program Office c/o Finance Department Attn: Brittany Cagle, CDBG Program Manager 300 West Waugh Street Dalton, GA 30720

Answered: 11 Skipped: 31

Dalton Fair Housing Survey and Needs Assessment

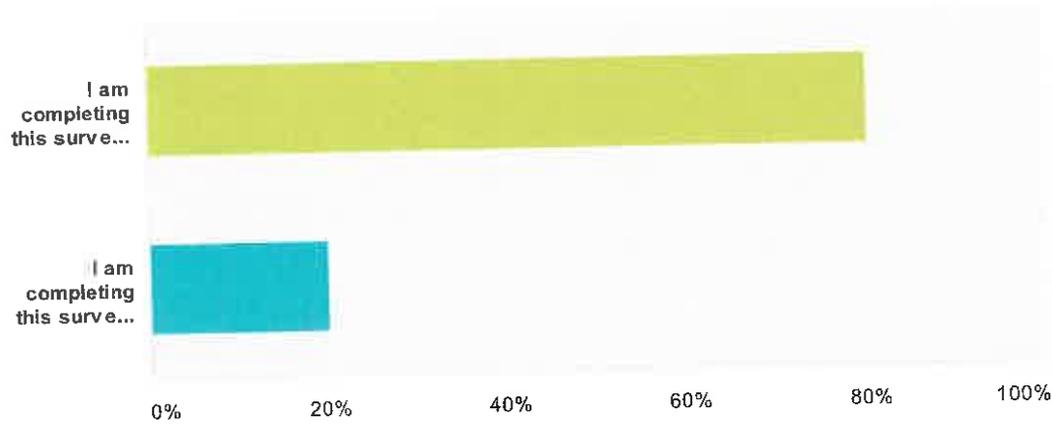


Answer Choices	Responses
Begin Needs Assessment	100% 11
Total	11

Dalton Fair Housing Survey and Needs Assessment

Q35 Please select from the following two options:

Answered: 15 Skipped: 27

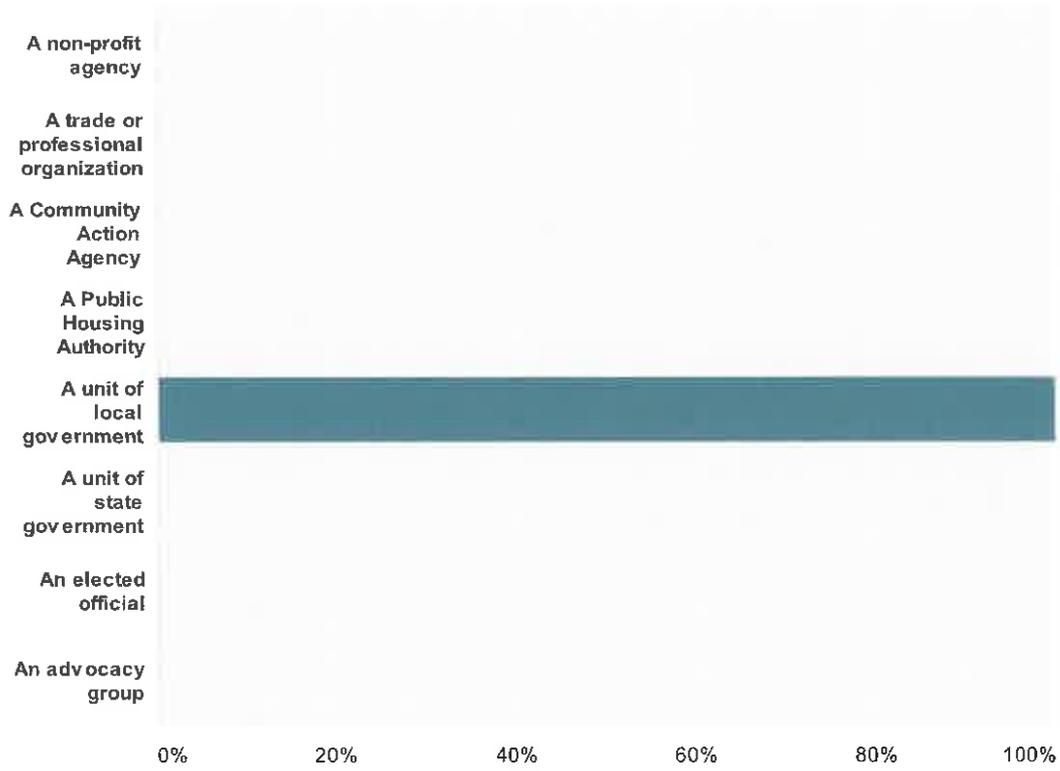


Answer Choices	Responses	
I am completing this survey as a resident of Dalton.	80%	12
I am completing this survey as a representative of an organization/agency.	20%	3
Total		15

Dalton Fair Housing Survey and Needs Assessment

Q36 Which of the following best describes yourself or your organization/agency?

Answered: 3 Skipped: 39

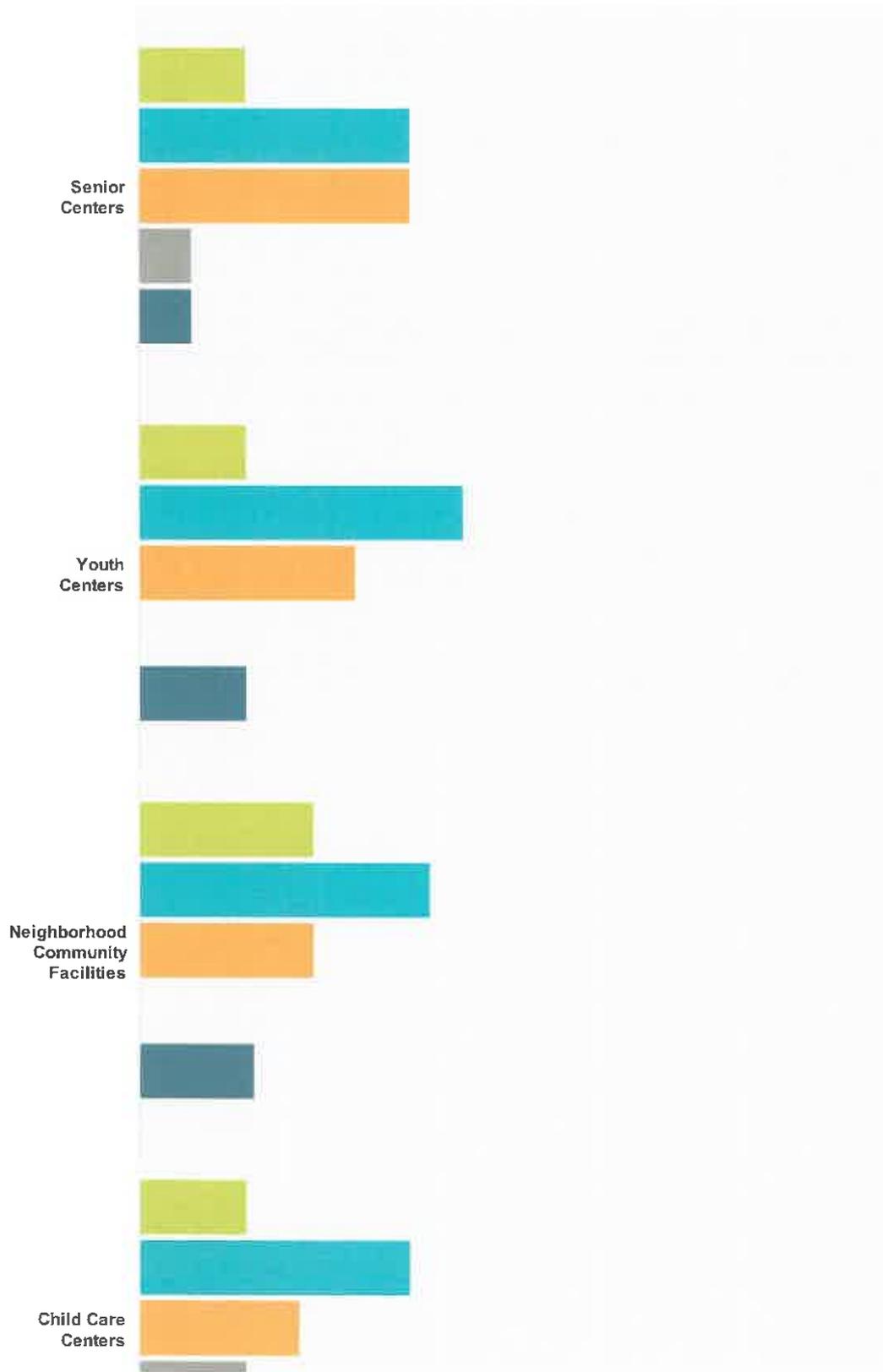


Answer Choices	Responses
A non-profit agency	0% 0
A trade or professional organization	0% 0
A Community Action Agency	0% 0
A Public Housing Authority	0% 0
A unit of local government	100% 3
A unit of state government	0% 0
An elected official	0% 0
An advocacy group	0% 0
Total	3

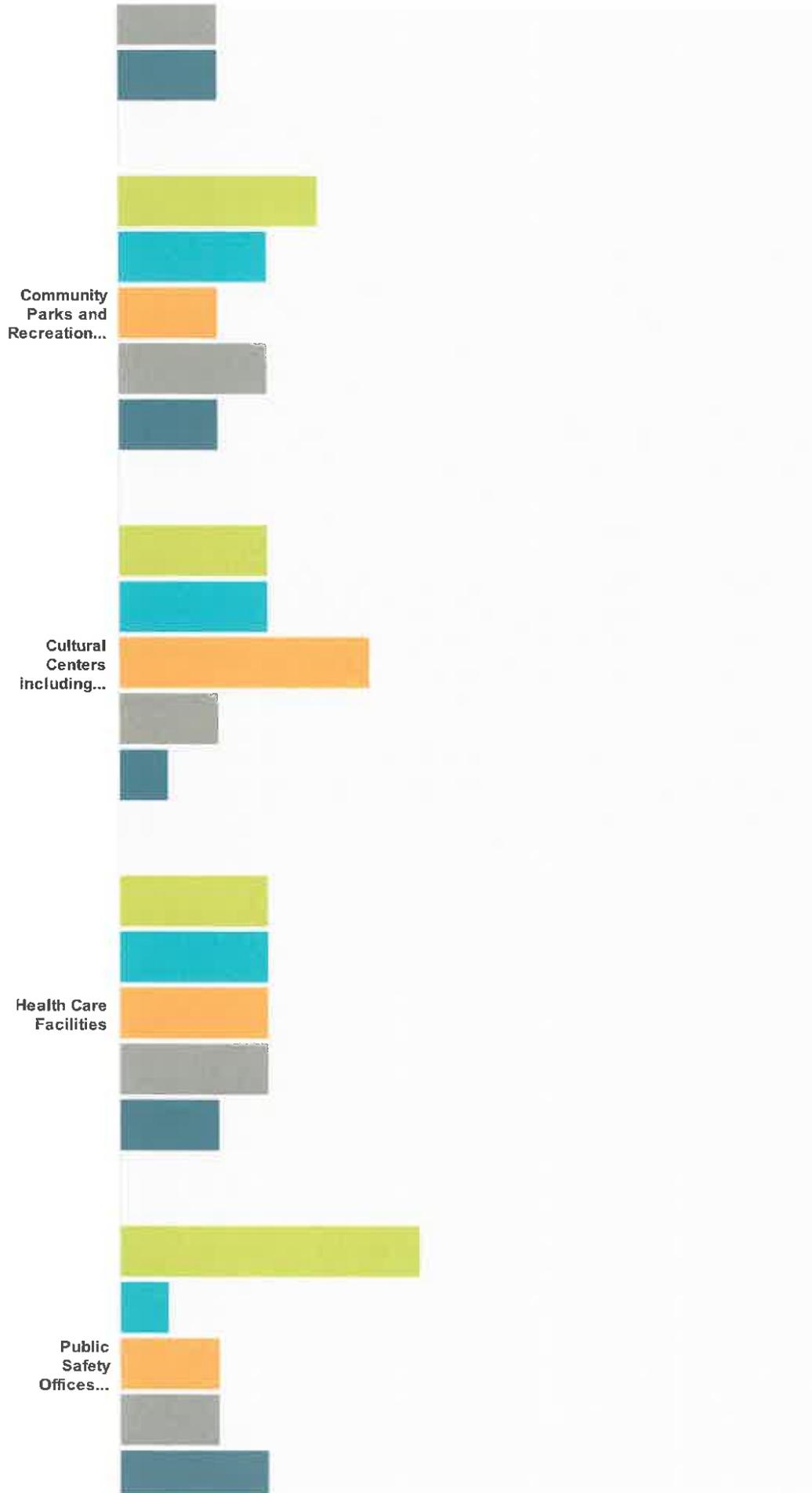
Dalton Fair Housing Survey and Needs Assessment

Q37 Please rank the following Public Facility Needs within Dalton on a scale ranging from a very low need to a very high need.

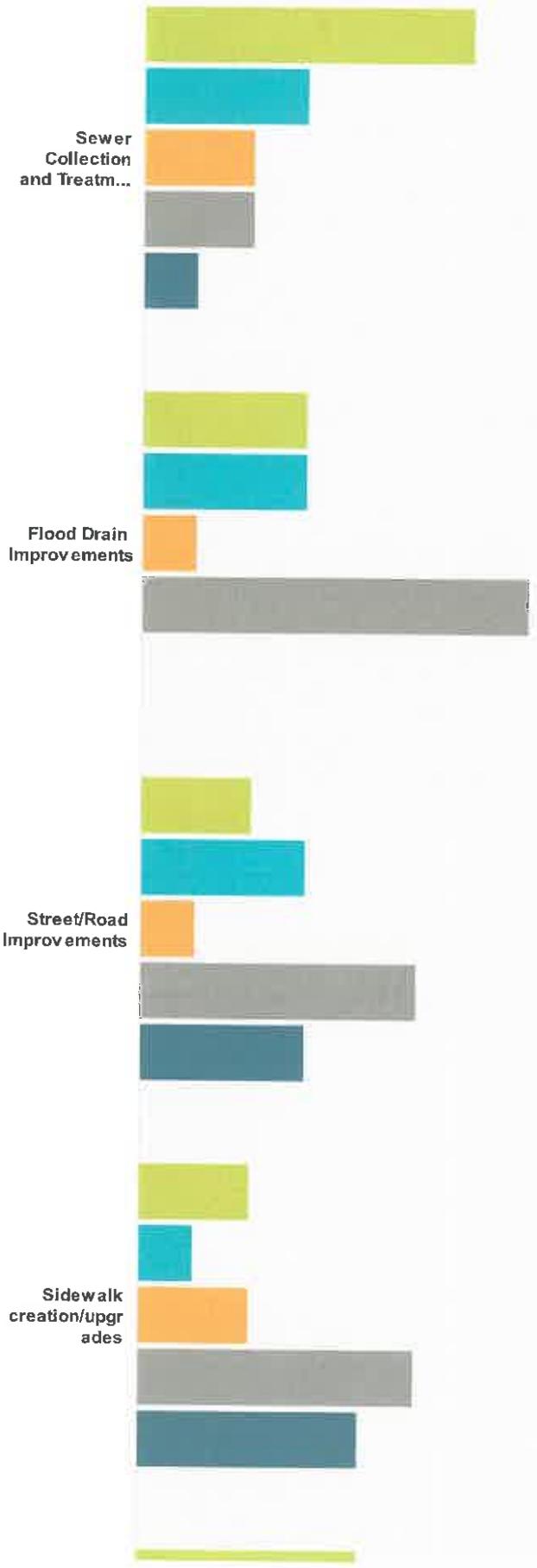
Answered: 14 Skipped: 28



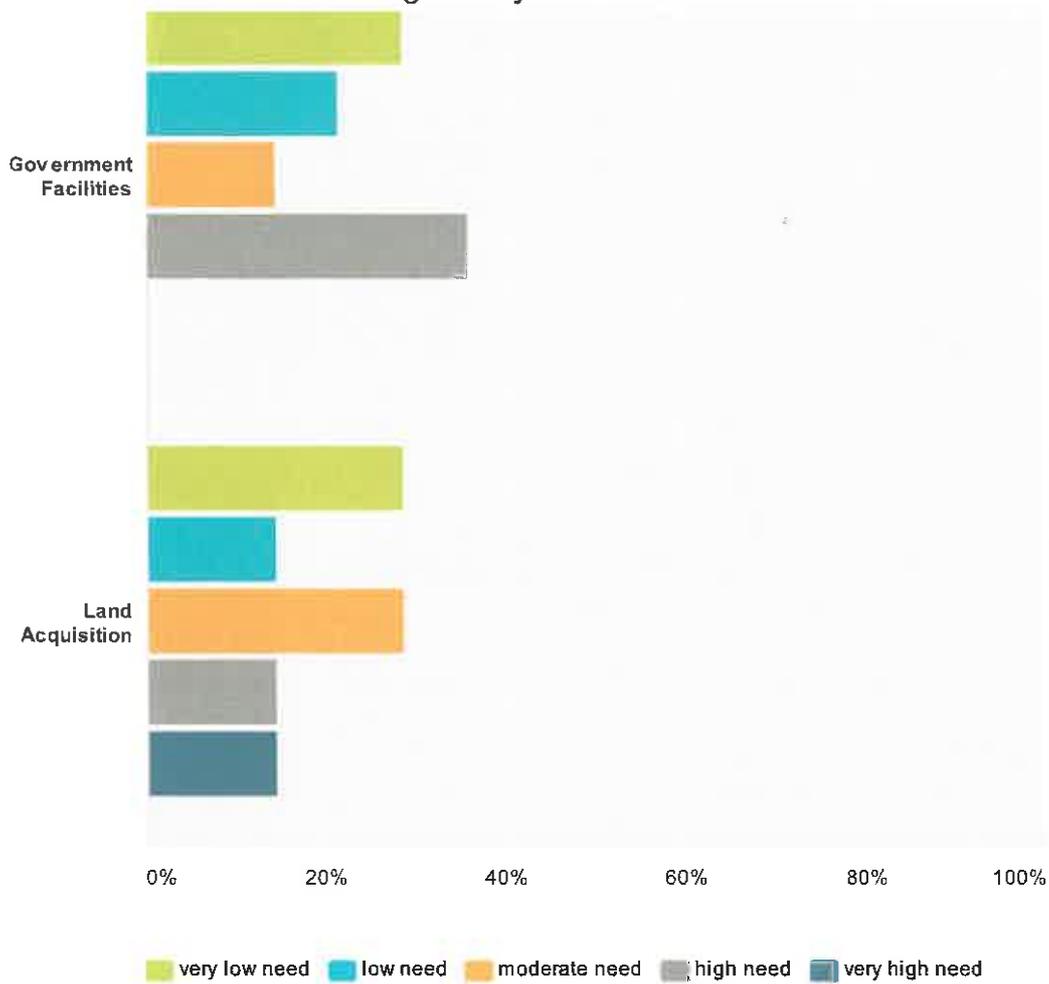
Dalton Fair Housing Survey and Needs Assessment



Dalton Fair Housing Survey and Needs Assessment



Dalton Fair Housing Survey and Needs Assessment



	very low need	low need	moderate need	high need	very high need	Total
Senior Centers	14.29% 2	35.71% 5	35.71% 5	7.14% 1	7.14% 1	14
Youth Centers	14.29% 2	42.86% 6	28.57% 4	0% 0	14.29% 2	14
Neighborhood Community Facilities	23.08% 3	38.46% 5	23.08% 3	0% 0	15.38% 2	13
Child Care Centers	14.29% 2	35.71% 5	21.43% 3	14.29% 2	14.29% 2	14
Community Parks and Recreational Facilities	28.57% 4	21.43% 3	14.29% 2	21.43% 3	14.29% 2	14
Cultural Centers including museums, etc.	21.43% 3	21.43% 3	35.71% 5	14.29% 2	7.14% 1	14
Health Care Facilities	21.43% 3	21.43% 3	21.43% 3	21.43% 3	14.29% 2	14
Public Safety Offices (Fire, Police, Emergency Management)	42.86% 6	7.14% 1	14.29% 2	14.29% 2	21.43% 3	14
Sewer Collection and Treatment Facilities	42.86% 6	21.43% 3	14.29% 2	14.29% 2	7.14% 1	14
Flood Drain Improvements	21.43% 3	21.43% 3	7.14% 1	50% 7	0% 0	14

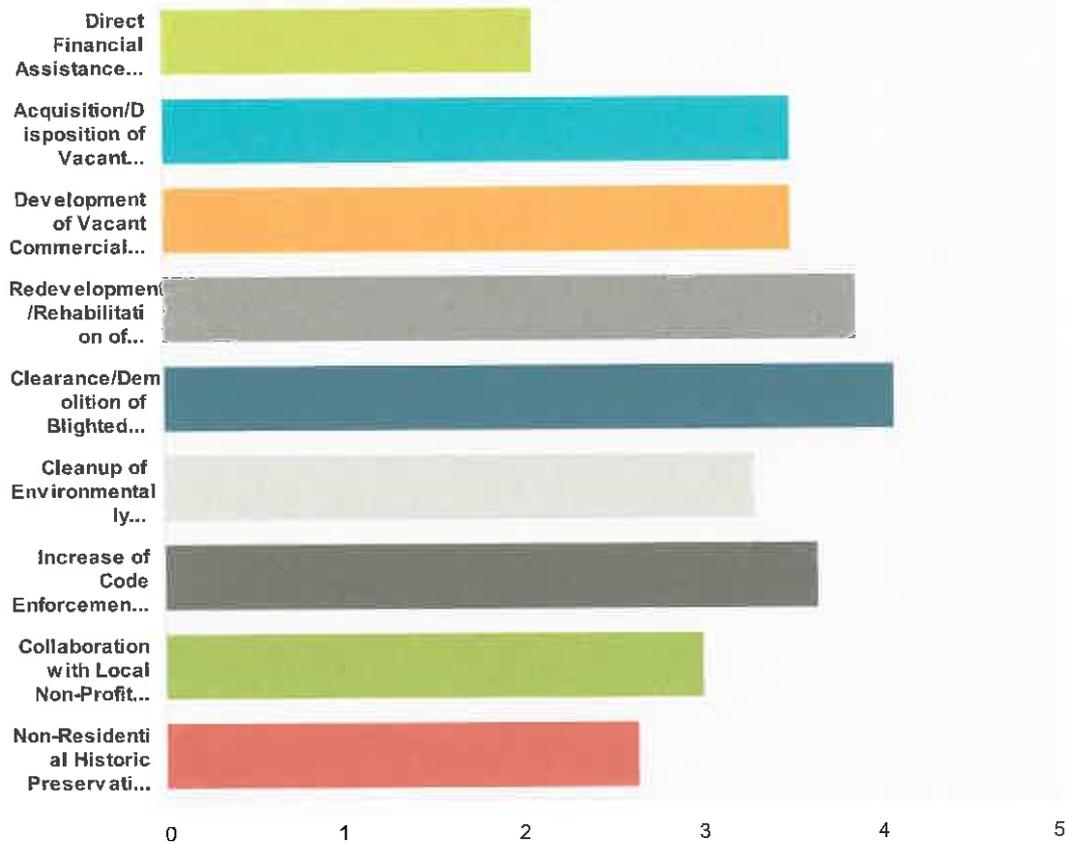
Dalton Fair Housing Survey and Needs Assessment

Street/Road Improvements	14.29% 2	21.43% 3	7.14% 1	35.71% 5	21.43% 3	14
Sidewalk creation/upgrades	14.29% 2	7.14% 1	14.29% 2	35.71% 5	28.57% 4	14
Government Facilities	28.57% 4	21.43% 3	14.29% 2	35.71% 5	0% 0	14
Land Acquisition	28.57% 4	14.29% 2	28.57% 4	14.29% 2	14.29% 2	14

Dalton Fair Housing Survey and Needs Assessment

Q38 Please rank the following Economic/Community Development Needs on a scale ranging from a very low need to a very high need.

Answered: 14 Skipped: 28



	very low need	low need	moderate need	high need	very high need	Total	Average Rating
Direct Financial Assistance to For-Profit Agencies	21.43% 3	50% 7	28.57% 4	0% 0	0% 0	14	2.07
Acquisition/Disposition of Vacant Commercial/Industrial Land	0% 0	28.57% 4	21.43% 3	21.43% 3	28.57% 4	14	3.50
Development of Vacant Commercial/Industrial Land	0% 0	14.29% 2	42.86% 6	21.43% 3	21.43% 3	14	3.50
Redevelopment/Rehabilitation of Commercial/Industrial Buildings including Facade Improvements, Life Safety Corrections, etc.	0% 0	14.29% 2	28.57% 4	14.29% 2	42.86% 6	14	3.86
Clearance/Demolition of Blighted Properties	0% 0	14.29% 2	21.43% 3	7.14% 1	57.14% 8	14	4.07
Cleanup of Environmentally Contaminated/Brownfields areas	0% 0	42.86% 6	21.43% 3	0% 0	35.71% 5	14	3.29
Increase of Code Enforcement Efforts	0% 0	21.43% 3	28.57% 4	14.29% 2	35.71% 5	14	3.64
Collaboration with Local Non-Profit Organizations	0% 0	30.77% 4	46.15% 6	15.38% 2	7.69% 1	13	3.00

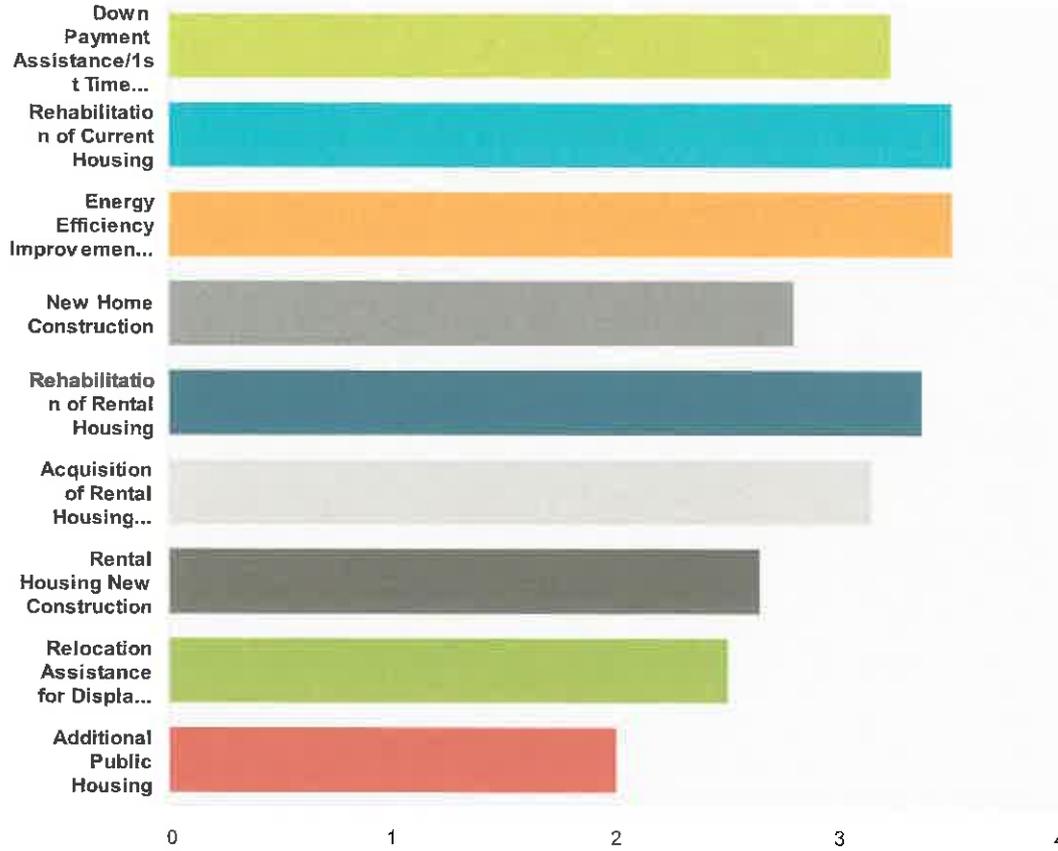
Dalton Fair Housing Survey and Needs Assessment

Non-Residential Historic Preservation Efforts	7.14%	42.86%	35.71%	7.14%	7.14%	14	2.64
	1	6	5	1	1		

Dalton Fair Housing Survey and Needs Assessment

Q39 Please rank the following Housing Needs on a scale ranging from a very low need to a very high need.

Answered: 14 Skipped: 28



	very low need	low need	moderate need	high need	very high need	Total	Average Rating
Down Payment Assistance/1st Time Homebuyer Program	0%	7.69%	69.23%	15.38%	7.69%	13	3.23
Rehabilitation of Current Housing	0%	0%	57.14%	35.71%	7.14%	14	3.50
Energy Efficiency Improvements to Current Housing	0%	7.14%	42.86%	42.86%	7.14%	14	3.50
New Home Construction	14.29%	28.57%	28.57%	21.43%	7.14%	14	2.79
Rehabilitation of Rental Housing	7.14%	0%	50%	35.71%	7.14%	14	3.36
Acquisition of Rental Housing Unites	0%	28.57%	35.71%	28.57%	7.14%	14	3.14
Rental Housing New Construction	21.43%	21.43%	28.57%	28.57%	0%	14	2.64
Relocation Assistance for Displaced Persons (Individuals, Families, Businesses, Non-Profits, Organizations, and Fams)	28.57%	21.43%	21.43%	28.57%	0%	14	2.50

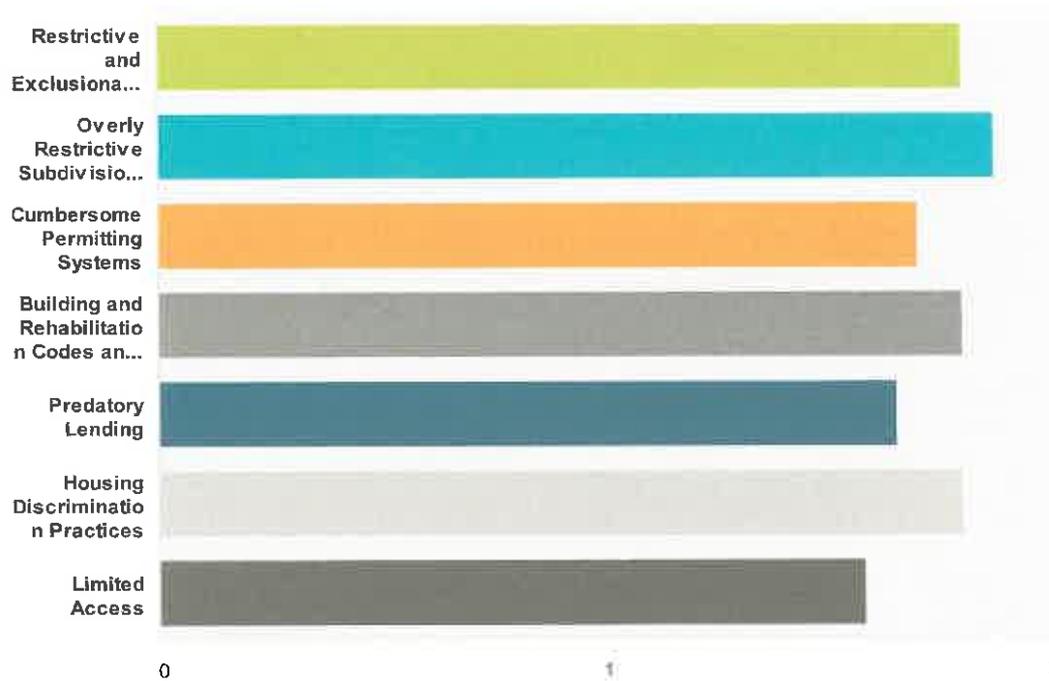
Dalton Fair Housing Survey and Needs Assessment

Additional Public Housing	50%	14.29%	21.43%	14.29%	0%	14	2.00
	7	2	3	2	0		

Dalton Fair Housing Survey and Needs Assessment

Q40 Please select whether the following are a barrier to Affordable Housing Needs within Dalton or are not a barrier to Affordable Housing Needs.

Answered: 14 Skipped: 28

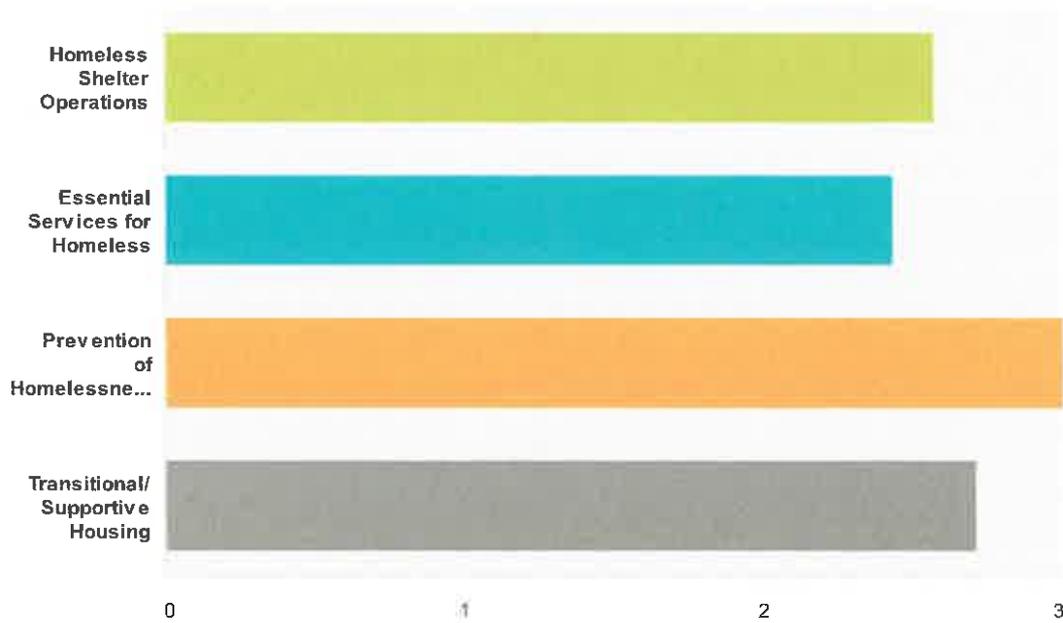


	barrier	not a barrier	Total	Average Rating
Restrictive and Exclusionary Zoning Ordinances	21.43% 3	78.57% 11	14	1.79
Overly Restrictive Subdivision Regulations	14.29% 2	85.71% 12	14	1.86
Cumbersome Permitting Systems	30.77% 4	69.23% 9	13	1.69
Building and Rehabilitation Codes and Building Materials	21.43% 3	78.57% 11	14	1.79
Predatory Lending	35.71% 5	64.29% 9	14	1.64
Housing Discrimination Practices	21.43% 3	78.57% 11	14	1.79
Limited Access	42.86% 6	57.14% 8	14	1.57

Dalton Fair Housing Survey and Needs Assessment

Q41 Please rank the following Homeless Needs within Dalton on a scale ranging from a very low need to a very high need.

Answered: 14 Skipped: 28



	very low need	low need	moderate need	high need	very high need	Total	Average Rating
Homeless Shelter Operations	21.43% 3	28.57% 4	35.71% 5	0% 0	14.29% 2	14	2.57
Essential Services for Homeless	21.43% 3	28.57% 4	35.71% 5	14.29% 2	0% 0	14	2.43
Prevention of Homelessness Program	7.14% 1	35.71% 5	28.57% 4	7.14% 1	21.43% 3	14	3.00
Transitional/Supportive Housing	14.29% 2	28.57% 4	35.71% 5	14.29% 2	7.14% 1	14	2.71

Dalton Fair Housing Survey and Needs Assessment

Q42 Please use the box below to provide any additional information that you feel are needs that need to be addressed by Dalton in terms of Housing issues within the community.

Answered: 3 Skipped: 39

Appendix - C

Home Mortgage Disclosure Act [HMDA] Data

Number of Loans	188	257	232	146	77	82	98	75
Median Loan Amount	\$110,500	\$120,000	\$118,000	\$112,000	\$114,000	\$97,000	\$109,000	\$91,000
Percent of All Loans	50%	60.05%	63.04%	54.28%	38.5%	35.65%	44.95%	38.07%
State (Georgia)								
Number of Loans	164,633	183,168	182,076	129,871	82,978	70,080	63,740	60,811
Median Loan Amount	\$144,000	\$148,000	\$154,000	\$163,000	\$160,000	\$149,000	\$146,000	\$141,000
Percent of All Loans	48.59%	52.81%	55.61%	50.99%	45.53%	31.74%	36.91%	36.44%
National								
Number of Loans	4,879,019	5,146,333	4,667,928	3,524,874	2,562,011	2,413,549	2,181,851	2,037,856
Median Loan Amount	\$156,000	\$170,000	\$174,000	\$176,000	\$174,000	\$164,000	\$168,000	\$166,000
Percent of All Loans	41.54%	44.52%	46.35%	45.53%	45.65%	31.11%	32.36%	34.44%

Refinance	2004	2005	2006	2007	2008	2009	2010	2011
City (Dalton)								
Number of Loans	188	171	136	123	123	148	120	122
Median Loan Amount	\$102,000	\$102,000	\$119,000	\$124,000	\$141,000	\$150,000	\$136,500	\$123,000
Percent of All Loans	50%	39.95%	36.96%	45.72%	61.5%	64.35%	55.05%	61.93%
State (Georgia)								
Number of Loans	174,155	163,657	145,360	124,823	99,269	150,687	108,944	106,051
Median Loan Amount	\$124,000	\$124,000	\$123,000	\$135,000	\$151,000	\$170,000	\$164,000	\$153,000
Percent of All Loans	51.41%	47.19%	44.39%	49.01%	54.47%	68.26%	63.09%	63.56%
National								
Number of Loans	6,867,419	6,413,231	5,402,695	4,217,202	3,049,768	5,344,270	4,561,438	3,879,718
Median Loan Amount	\$140,000	\$155,000	\$153,000	\$160,000	\$165,000	\$183,000	\$179,000	\$170,000
Percent of All Loans	58.46%	55.48%	53.65%	54.47%	54.35%	68.89%	67.64%	65.56%

(-) Originations by Income

Lending by Borrower Income

9.64% of loans in this area were for borrowers whose income was less than 50% of the Metropolitan Statistical Area's (MSA) Median Income in 2011 (<\$25,100), and 23.35% were for borrowers with incomes between 50% and 80% of MSA (or "area") income (\$25,100 - \$40,160). 17.26% of loans went to borrowers with incomes between 80% and 120% of area income (\$40,160 - \$60,240), and 40.1% went to borrowers with incomes greater than 120% of area income (\$60,240+). MSA Median Income (area income) \$50,200 in this area in 2011.

Borrowers <50% of MSA Median Income	2004	2005	2006	2007	2008	2009	2010	2011
City (Dalton)								
Number of Loans	61	59	36	18	20	17	29	19
Median Loan Amount	\$87,000	\$100,000	\$90,500	\$80,500	\$83,500	\$79,000	\$74,000	\$54,000
Percent of All Loans	16.22%	13.79%	9.78%	6.69%	10%	7.39%	13.3%	9.64%
State (Georgia)								
Number of Loans	29,323	28,461	22,658	16,632	13,738	18,928	16,643	14,508
Median Loan Amount	\$93,000	\$95,000	\$95,000	\$95,000	\$89,000	\$92,000	\$86,000	\$78,000
Percent of All Loans	8.66%	8.21%	6.92%	6.53%	7.54%	8.57%	9.64%	8.69%
National								
Number of Loans	781,388	677,999	553,901	409,461	350,484	533,359	461,498	431,542

Median Loan Amount	\$79,000	\$81,000	\$80,000	\$82,000	\$86,000	\$96,000	\$93,000	\$90,000
Percent of All Loans	6.65%	5.87%	5.5%	5.29%	6.25%	6.88%	6.84%	7.29%

Borrowers 50%-80% of MSA Median Income	2004	2005	2006	2007	2008	2009	2010	2011
City (Dalton)								
Number of Loans	97	101	101	86	39	62	48	46
Median Loan Amount	\$89,000	\$100,000	\$98,000	\$109,000	\$96,000	\$93,000	\$86,000	\$76,000
Percent of All Loans	25.8%	23.6%	27.45%	31.97%	19.5%	26.96%	22.02%	23.35%
State (Georgia)								
Number of Loans	85,858	86,219	70,671	54,679	39,486	40,622	31,641	26,359
Median Loan Amount	\$119,000	\$122,000	\$123,000	\$126,000	\$126,000	\$125,000	\$120,000	\$110,000
Percent of All Loans	25.34%	24.86%	21.58%	21.47%	21.67%	18.4%	18.32%	15.8%
National								
Number of Loans	2,301,888	2,124,799	1,718,144	1,346,263	1,062,357	1,393,420	1,173,311	1,015,589
Median Loan Amount	\$112,000	\$118,000	\$117,000	\$121,000	\$125,000	\$131,000	\$128,000	\$124,000
Percent of All Loans	19.6%	18.38%	17.06%	17.39%	18.93%	17.96%	17.4%	17.16%

Borrowers 80%-120% of MSA Median Income	2004	2005	2006	2007	2008	2009	2010	2011
City (Dalton)								
Number of Loans	87	108	79	50	47	37	40	34
Median Loan Amount	\$117,000	\$117,000	\$120,000	\$113,500	\$125,000	\$136,000	\$119,500	\$108,000
Percent of All Loans	23.14%	25.23%	21.47%	18.59%	23.5%	16.09%	18.35%	17.26%
State (Georgia)								
Number of Loans	86,944	90,493	84,938	66,238	46,124	47,167	37,145	32,209
Median Loan Amount	\$137,000	\$141,000	\$142,000	\$149,000	\$153,000	\$158,000	\$150,000	\$140,000
Percent of All Loans	25.86%	26.09%	25.94%	26.01%	25.31%	21.37%	21.51%	19.3%
National								
Number of Loans	3,118,881	3,037,117	2,537,390	1,943,123	1,456,865	1,834,661	1,579,628	1,338,537
Median Loan Amount	\$144,000	\$154,000	\$152,000	\$155,000	\$162,000	\$167,000	\$163,000	\$157,000
Percent of All Loans	26.55%	26.27%	25.2%	25.1%	25.96%	23.65%	23.43%	22.62%

Borrowers > 120% of MSA Median Income	2004	2005	2006	2007	2008	2009	2010	2011
City (Dalton)								
Number of Loans	116	152	137	108	90	105	93	79
Median Loan Amount	\$152,500	\$159,500	\$176,000	\$158,500	\$185,500	\$186,000	\$172,000	\$148,000
Percent of All Loans	30.85%	35.51%	37.23%	40.15%	45%	45.65%	42.66%	40.1%
State (Georgia)								
Number of Loans	111,704	119,612	128,757	108,210	75,566	90,633	74,475	73,754
Median Loan Amount	\$189,000	\$196,000	\$194,000	\$201,000	\$217,000	\$227,000	\$220,000	\$210,000
Percent of All Loans	32.97%	34.49%	39.32%	42.49%	41.46%	41.05%	43.13%	44.2%

National								
Number of Loans	4,721,740	5,009,444	4,648,458	3,707,026	2,491,686	3,287,414	3,078,751	2,657,645
Median Loan Amount	\$212,000	\$239,000	\$240,000	\$233,000	\$232,000	\$237,000	\$235,000	\$232,000
Percent of All Loans	40.2%	43.34%	46.16%	47.88%	44.4%	42.38%	45.66%	44.91%

Lending by Tract Income

0% of loans in this area were in Census Tract(s) with median income(s) of less than 50% of the Metropolitan Statistical Area's (MSA) Median Income in 2011 (<\$25,100), and 13.2% were in tract(s) with income(s) between 50% and 80% of MSA (or "area") income (\$25,100 - \$40,160). 54.82% of loans were in tracts with income(s) between 80% and 120% of area income (\$40,160 - \$60,240), and 31.98% went to residents in tracts with incomes greater than 120% of area income (\$60,240+). MSA Median Income (area income) \$50,200 in this area in 2011.

Tracts with <50% of MSA Median Income	2004	2005	2006	2007	2008	2009	2010	2011
City (Dalton)								
Number of Loans	1	0	0	0	0	0	0	0
Median Loan Amount	N/A							
Percent of All Loans	0.27%	0%	0%	0%	0%	0%	0%	0%
State (Georgia)								
Number of Loans	9,156	9,142	6,957	4,950	3,054	2,746	1,890	1,581
Median Loan Amount	\$120,000	\$128,000	\$140,000	\$150,000	\$143,000	\$153,000	\$143,000	\$139,000
Percent of All Loans	2.7%	2.64%	2.12%	1.94%	1.68%	1.24%	1.09%	0.95%
National								
Number of Loans	297,499	279,979	177,064	121,345	65,110	59,220	49,455	41,991
Median Loan Amount	\$123,000	\$140,000	\$154,000	\$158,000	\$151,000	\$160,000	\$160,000	\$158,000
Percent of All Loans	2.53%	2.42%	1.76%	1.57%	1.16%	0.76%	0.73%	0.71%

Tracts with 50%-80% of MSA Median Income	2004	2005	2006	2007	2008	2009	2010	2011
City (Dalton)								
Number of Loans	98	97	89	64	38	43	41	26
Median Loan Amount	\$87,000	\$90,000	\$100,000	\$97,500	\$99,000	\$90,000	\$76,000	\$86,000
Percent of All Loans	26.06%	22.66%	24.18%	23.79%	19%	18.7%	18.81%	13.2%
State (Georgia)								
Number of Loans	43,076	44,304	42,864	33,206	21,683	20,325	14,723	13,322
Median Loan Amount	\$111,000	\$115,000	\$119,000	\$125,000	\$124,000	\$124,000	\$114,000	\$109,000
Percent of All Loans	12.71%	12.77%	13.09%	13.04%	11.9%	9.21%	8.53%	7.98%
National								
Number of Loans	1,571,071	1,619,156	1,465,200	1,027,956	625,849	657,447	540,859	467,570
Median Loan Amount	\$117,000	\$135,000	\$141,000	\$141,000	\$135,000	\$138,000	\$135,000	\$129,000
Percent of All Loans	13.37%	14.01%	14.55%	13.28%	11.15%	8.47%	8.02%	7.9%

Tracts with 80%-120% of MSA Median Income	2004	2005	2006	2007	2008	2009	2010	2011
City (Dalton)								

Number of Loans	187	227	190	139	100	111	111	108
Median Loan Amount	\$114,000	\$119,000	\$124,000	\$120,000	\$118,500	\$119,000	\$125,000	\$105,000
Percent of All Loans	49.73%	53.04%	51.63%	51.67%	50%	48.26%	50.92%	54.82%
State (Georgia)								
Number of Loans	165,989	170,172	163,910	128,385	91,549	101,998	77,546	75,039
Median Loan Amount	\$125,000	\$128,000	\$133,000	\$140,000	\$143,000	\$143,000	\$135,000	\$127,000
Percent of All Loans	48.99%	49.07%	50.06%	50.41%	50.23%	46.2%	44.91%	44.97%
National								
Number of Loans	5,800,901	5,826,865	5,115,284	3,943,334	2,860,741	3,755,576	3,188,528	2,796,896
Median Loan Amount	\$133,000	\$147,000	\$150,000	\$152,000	\$152,000	\$155,000	\$152,000	\$145,000
Percent of All Loans	49.38%	50.41%	50.79%	50.93%	50.98%	48.41%	47.28%	47.26%

Tracts with > 120% of MSA Median Income	2004	2005	2006	2007	2008	2009	2010	2011
City (Dalton)								
Number of Loans	90	104	89	66	62	76	66	63
Median Loan Amount	\$134,500	\$140,500	\$147,000	\$151,000	\$166,000	\$176,000	\$155,500	\$129,000
Percent of All Loans	23.94%	24.3%	24.18%	24.54%	31%	33.04%	30.28%	31.98%
State (Georgia)								
Number of Loans	120,567	123,207	112,794	87,707	65,423	95,132	78,106	76,628
Median Loan Amount	\$165,000	\$170,000	\$174,000	\$184,000	\$197,000	\$201,000	\$195,000	\$185,000
Percent of All Loans	35.59%	35.52%	34.45%	34.44%	35.9%	43.09%	45.23%	45.92%
National								
Number of Loans	4,076,946	3,833,549	3,222,274	2,586,516	1,996,605	3,186,804	2,915,477	2,573,088
Median Loan Amount	\$192,000	\$209,000	\$207,000	\$214,000	\$216,000	\$219,000	\$217,000	\$212,000
Percent of All Loans	34.71%	33.16%	32%	33.41%	35.58%	41.08%	43.24%	43.48%

(-) High-Cost Originations

In PolicyMap, a loan is considered high cost when there is a rate spread reported. In the fourth quarter of 2009, HMDA changed its rules for reporting rate spreads in an effort to more accurately capture the current high-cost lending activity. Therefore, data shown here separates the first three quarters of 2009 from the last quarter of 2009. The 2010 and 2011 data in the table below represents the rate spread rule change implemented in 2009Q4. Change calculations between 2011 and years previous to 2010 should not be made due to the adjusted reporting rules implemented beginning in the fourth quarter of 2009.

For 2004-2009Q3, the rate spread on a loan was the difference between the Annual Percentage Rate (APR) on the loan and the treasury security yields as of the date of the loan's origination. Rate spreads were only reported by financial institutions if the APR was three or more percentage points higher for a first lien loan, or five or more percentage points higher for a second lien loan. A rate spread of three or more suggested that a loan was of notably higher cost than a typical loan.

For 2009Q4, 2010 and 2011, the rate spread on a loan is the difference between the Annual Percentage Rate (APR) on the loan and the estimated average prime offer rate (APOR). Rate spreads are only reported by financial institutions if the APR is more than 1.5 percentage points higher for a first lien loan, or more than 3.5 percentage points higher for a second lien loan.

High-Cost Lending

4.05% of loans originated in this area were high-cost loans in 2011, compared to 2.93% of loans in Georgia.

High-Cost Loans	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
City (Dalton)									
Number of Loans	52	101	84	48	34	18	4	8	8
Median Loan Amount	\$88,000	\$95,000	\$109,000	\$125,000	\$133,000	\$157,500	N/A	\$104,500	\$39,500
Percent of All Loans	13.83%	23.6%	22.83%	17.84%	17%	9.42%	10.26%	3.67%	4.06%
State (Georgia)									
Number of Loans	59,851	96,450	92,501	47,923	23,113	12,186	923	4,250	4,893
Median Loan Amount	\$115,000	\$124,000	\$128,000	\$128,000	\$105,000	\$99,000	\$80,000	\$78,000	\$80,000
Percent of All Loans	17.67%	27.81%	28.25%	18.82%	12.68%	6.28%	3.46%	2.46%	2.93%
National									
Number of Loans	1,709,639	2,909,619	2,827,156	1,364,023	556,800	311,065	23,951	145,203	163,776
Median Loan Amount	\$116,000	\$145,000	\$152,000	\$144,000	\$107,000	\$103,000	\$81,000	\$88,000	\$99,000
Percent of All Loans	14.55%	25.17%	28.07%	17.62%	9.92%	4.53%	2.67%	2.15%	2.77%

High-Cost Lending by Loan Type

High-Cost Loans	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
Purchase									
Number of Loans	17	41	35	15	8	6	0	1	2
Median Loan Amount	\$115,000	\$95,000	\$124,000	\$121,000	\$216,500	\$109,000	N/A	N/A	N/A
Percent of Purchase Loans	9.04%	15.95%	15.09%	10.27%	10.35%	10.34%	0%	1.02%	2.67%
Refinance									
Number of Loans	35	60	49	33	26	12	4	7	6
Median Loan Amount	\$81,000	\$94,500	\$88,000	\$126,000	\$127,000	\$204,000	N/A	\$85,000	\$36,500
Percent of Refinance Loans	18.62%	35.09%	36.03%	26.83%	21.14%	9.02%	26.67%	5.83%	4.92%

High-Cost Lending by Race

Looking across high-cost loans originated in 2011 in this area, 75% were to Whites, 12.5% were to African Americans, 0% were to Asians, and 0% were to Hispanics.

High-Cost	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
Loans to Whites									
Number of Loans	42	84	71	40	32	17	4	8	6
Median Loan Amount	\$88,000	\$95,000	\$119,000	\$121,500	\$141,500	\$165,000	N/A	\$104,500	\$63,500
Percent of Loans to Whites	13.38%	22.83%	22.68%	16.81%	17.78%	9.94%	12.5%	4.08%	3.45%
Percent of High-Cost Loans	80.77%	83.17%	84.52%	83.33%	94.12%	94.44%	100%	100%	75%
Loans to African Americans									
Number of Loans	5	3	1	1	0	0	0	0	1
Median Loan Amount	\$81,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Percent of Loans to African Americans	50%	37.5%	11.11%	100%	0%	0%	0%	0%	25%
Percent of High-Cost Loans	9.62%	2.97%	1.19%	2.08%	0%	0%	0%	0%	12.5%
Loans to Asians									

Number of Loans	1	1	1	0	0	0	0	0	0
Median Loan Amount	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Percent of Loans to Asians	8.33%	11.11%	10%	0%	0%	0%	0%	0%	0%
Percent of High-Cost Loans	1.92%	0.99%	1.19%	0%	0%	0%	0%	0%	0%
Loans to Hispanics									
Number of Loans	18	30	22	12	7	3	2	0	0
Median Loan Amount	\$82,500	\$93,500	\$88,000	\$105,500	\$85,000	N/A	N/A	N/A	N/A
Percent of Loans to Hispanics	15.79%	17.96%	17.32%	11.21%	11.86%	8.11%	16.67%	0%	0%
Percent of High-Cost Loans	34.62%	29.7%	26.19%	25%	20.59%	16.67%	50%	0%	0%
Loans to Nonhispanics									
Number of Loans	29	60	53	30	26	15	2	8	7
Median Loan Amount	\$89,000	\$101,000	\$130,000	\$123,000	\$202,500	\$165,000	N/A	\$104,500	\$40,000
Percent of Loans to Nonhispanics	13.3%	25%	24.88%	20.55%	19.12%	10.42%	8%	5.06%	5.04%
Percent of High-Cost Loans	55.77%	59.41%	63.1%	62.5%	76.47%	83.33%	50%	100%	87.5%

High Cost Lending by Borrower Income

10.53% of loans in this area where the borrowers' income was less than 50% of the Metropolitan Statistical Area's (MSA) Median Income were high cost in 2011 (<\$25,100), and 0% of loans where borrowers' incomes were between 50% and 80% of MSA (or "area") income (\$25,100 - \$40,160) were high cost. 0% of loans that went to borrowers with incomes between 80% and 120% of area income (\$40,160 - \$60,240) were high cost, and 5.06% of loans that went to borrowers with incomes >120% of area income (\$60,240+) were high cost. MSA Median Income (area income) \$50,200 in this area in 2011.

High-Cost Loans to Borrowers w/ <50% of MSA Median Income	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
City (Daiton)									
Number of Loans	10	9	5	4	4	1	0	1	2
Median Loan Amount	\$63,000	\$68,000	\$89,000	N/A	N/A	N/A	N/A	N/A	N/A
Percent of Loans with Borrower Inc <50% MSA Median	16.39%	15.25%	13.89%	22.22%	20%	6.67%	N/A	3.45%	10.53%
State (Georgia)									
Number of Loans	7,687	11,143	7,923	4,230	3,207	2,015	179	697	957
Median Loan Amount	\$81,000	\$91,000	\$89,000	\$76,000	\$59,000	\$60,000	\$49,000	\$53,000	\$57,000
Percent of Loans with Borrower Inc <50% MSA Median	26.21%	39.15%	34.97%	25.43%	23.34%	12.39%	6.7%	4.19%	6.6%
National									
Number of Loans	168,082	224,013	183,930	97,781	64,579	39,532	3,429	18,282	21,934
Median Loan Amount	\$68,000	\$76,000	\$75,000	\$69,000	\$59,000	\$62,000	\$50,000	\$55,000	\$62,000
Percent of Loans with Borrower Inc <50% MSA Median	21.51%	33.04%	33.21%	23.88%	18.43%	8.51%	4.99%	3.96%	5.08%

High-Cost Loans to Borrowers w/ 50%-80% of MSA Median Income	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
City (Daiton)									
Number of Loans	17	26	17	8	3	3	0	1	0
Median Loan Amount	\$84,000	\$94,500	\$85,000	\$102,000	N/A	N/A	N/A	N/A	N/A

Percent of Loans with Borrower Inc 50% - 80% MSA Median	17.53%	25.74%	16.83%	9.3%	7.69%	6.67%	0%	2.08%	0%
State (Georgia)									
Number of Loans	19,218	30,658	23,889	11,442	5,888	2,811	210	748	1,032
Median Loan Amount	\$111,000	\$118,000	\$119,000	\$113,000	\$96,000	\$87,000	\$71,000	\$70,000	\$78,500
Percent of Loans with Borrower Inc 50% - 80% MSA Median	22.38%	35.56%	33.8%	20.93%	14.91%	7.98%	3.88%	2.36%	3.92%
National									
Number of Loans	443,791	667,937	541,967	268,361	135,900	69,407	5,076	26,950	33,992
Median Loan Amount	\$98,000	\$112,000	\$111,000	\$105,000	\$89,000	\$88,000	\$69,000	\$73,000	\$85,000
Percent of Loans with Borrower Inc 50% - 80% MSA Median	19.28%	31.44%	31.54%	19.93%	12.79%	5.65%	3.09%	2.3%	3.35%

High-Cost Loans to Borrowers w/ 80%-120% of MSA Median	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
City (Dalton)									
Number of Loans	11	31	21	6	7	4	1	2	0
Median Loan Amount	\$116,000	\$116,000	\$102,000	\$123,500	\$128,000	N/A	N/A	N/A	N/A
Percent of Loans with Borrower Inc 80% - 120% MSA Median	12.64%	28.7%	26.58%	12%	14.89%	12.5%	20%	5%	0%
State (Georgia)									
Number of Loans	16,799	27,413	26,448	13,531	5,891	2,581	147	687	834
Median Loan Amount	\$125,000	\$135,000	\$137,000	\$134,000	\$116,000	\$103,000	\$70,000	\$75,000	\$86,500
Percent of Loans with Borrower Inc 80% - 120% MSA Median	19.32%	30.29%	31.14%	20.43%	12.77%	6.2%	2.64%	1.85%	2.59%
National									
Number of Loans	520,313	861,179	759,974	360,189	150,771	72,872	4,823	26,812	32,606
Median Loan Amount	\$126,000	\$150,000	\$150,000	\$140,000	\$116,000	\$108,000	\$80,000	\$87,000	\$102,000
Percent of Loans with Borrower Inc 80% - 120% MSA Median	16.68%	28.36%	29.95%	18.54%	10.35%	4.47%	2.38%	1.7%	2.44%

High-Cost Loans to Borrowers w/ > 120% of MSA Median Income	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
City (Dalton)									
Number of Loans	12	35	37	29	20	10	2	2	4
Median Loan Amount	\$138,500	\$131,000	\$179,000	\$156,000	\$227,000	\$128,500	N/A	N/A	N/A
Percent of Loans with Borrower Inc > 120% MSA Median	10.34%	23.03%	27.01%	26.85%	22.22%	10.87%	15.38%	2.15%	5.06%
State (Georgia)									
Number of Loans	14,062	23,725	28,062	16,741	7,634	3,763	249	1,112	1,317
Median Loan Amount	\$152,000	\$168,000	\$171,000	\$167,000	\$146,000	\$135,000	\$107,000	\$104,000	\$117,000
Percent of Loans with Borrower Inc > 120% MSA Median	12.59%	19.83%	21.79%	15.47%	10.1%	4.64%	2.6%	1.49%	1.79%
National									

Number of Loans	528,844	1,058,526	1,166,227	567,319	192,233	99,584	7,012	43,478	49,046
Median Loan Amount	\$175,000	\$235,000	\$247,000	\$221,000	\$156,000	\$133,000	\$106,000	\$116,000	\$138,000
Percent of Loans with Borrower inc > 120% MSA Median	11.2%	21.13%	25.09%	15.3%	7.71%	3.39%	2.03%	1.41%	1.85%

High Cost Lending by Tract income

N/A of high-cost loans in this area where the Census Tract income was <50% of the Metropolitan Statistical Area (MSA) Median Income were high cost in 2011 (<\$25,100), and 0% where the Census Tract income was between 50% and 80% of the MSA Median Income were high cost (\$25,100 - \$40,160). 5.56% of loans where the Census Tract income was between 80% and 120% of the MSA Median Income were high cost (\$40,160 - \$60,240), and 3.17% of loans where the Census Tract income was >120% of the MSA Median Income were high cost (\$60,240+). MSA Median Income (area income) \$50,200 in this area in 2011.

High-Cost Loans to Borrowers in Tracts with <50% of MSA Median Income	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
City (Dalton)									
Number of Loans	1	0	0	0	0	0	0	0	0
Median Loan Amount	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Percent of Loans with Tract Inc <50% MSA Median	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
State (Georgia)									
Number of Loans	2,997	4,041	3,142	1,468	505	201	27	97	73
Median Loan Amount	\$110,000	\$122,000	\$135,000	\$135,000	\$86,000	\$63,000	\$55,000	\$56,000	\$58,000
Percent of Loans with Tract Inc <50% MSA Median	32.73%	44.2%	45.16%	29.66%	16.54%	8.54%	6.87%	5.13%	4.62%
National									
Number of Loans	65,327	99,302	83,881	37,684	11,390	4,241	371	2,268	2,274
Median Loan Amount	\$92,000	\$126,000	\$140,000	\$128,000	\$89,000	\$88,000	\$70,000	\$71,000	\$79,000
Percent of Loans with Tract Inc <50% MSA Median	21.96%	35.47%	47.37%	31.06%	17.49%	8.15%	5.15%	4.59%	5.42%

High-Cost Loans to Borrowers in Tracts with 50%-80% of MSA Median Income	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
City (Dalton)									
Number of Loans	18	24	16	6	6	2	2	1	0
Median Loan Amount	\$84,000	\$78,500	\$83,000	\$113,000	\$91,000	N/A	N/A	N/A	N/A
Percent of Loans with Tract Inc 50% - 80% MSA Median	18.37%	24.74%	17.98%	9.38%	15.79%	5.88%	22.22%	2.44%	0%
State (Georgia)									
Number of Loans	11,289	17,270	16,417	8,271	4,203	2,018	165	749	697
Median Loan Amount	\$100,000	\$109,000	\$113,000	\$110,000	\$84,000	\$75,000	\$59,000	\$62,000	\$62,000
Percent of Loans with Tract Inc 50% - 80% MSA Median	26.21%	38.98%	38.3%	24.91%	19.38%	11.35%	6.46%	5.09%	5.23%
National									
Number of Loans	369,563	618,486	594,856	271,006	99,428	45,156	3,678	21,821	23,500
Median Loan Amount	\$96,000	\$126,000	\$135,000	\$124,000	\$87,000	\$83,000	\$67,000	\$69,000	\$75,000

Percent of Loans with Tract Inc 50% - 80% MSA Median	23.52%	38.2%	40.6%	26.36%	15.89%	7.81%	4.64%	4.03%	5.03%
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High-Cost Loans to Borrowers in Tracts with 80%-120% of MSA Median Income	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
City (Dalton)									
Number of Loans	21	57	44	22	17	11	1	6	6
Median Loan Amount	\$81,000	\$102,000	\$126,000	\$121,000	\$64,000	\$146,000	N/A	\$73,500	\$36,500
Percent of Loans with Tract Inc 80% - 120% MSA Median	11.23%	25.11%	23.16%	15.83%	17%	11.83%	5.56%	5.41%	5.56%
State (Georgia)									
Number of Loans	32,534	52,055	50,222	26,846	13,599	7,344	525	2,429	2,941
Median Loan Amount	\$113,000	\$121,000	\$125,000	\$124,000	\$102,000	\$93,000	\$76,000	\$76,000	\$77,000
Percent of Loans with Tract Inc 80% - 120% MSA Median	19.6%	30.59%	30.64%	20.91%	14.85%	8.21%	4.18%	3.13%	3.92%
National									
Number of Loans	915,011	1,551,306	1,499,882	739,646	321,786	180,608	13,874	82,408	93,676
Median Loan Amount	\$113,000	\$139,000	\$144,000	\$135,000	\$102,000	\$97,000	\$77,000	\$85,000	\$94,000
Percent of Loans with Tract Inc 80% - 120% MSA Median	15.77%	26.62%	29.32%	18.76%	11.25%	5.44%	3.18%	2.58%	3.35%

High-Cost Loans to Borrowers in Tracts with > 120% of MSA Median Income	2004	2005	2006	2007	2008	2009Q1 - 2009Q3	2009Q4	2010	2011
City (Dalton)									
Number of Loans	12	20	24	20	11	5	1	1	2
Median Loan Amount	\$128,000	\$130,000	\$136,500	\$195,000	\$310,000	\$209,000	N/A	N/A	N/A
Percent of Loans with Tract Inc > 120% MSA Median	13.33%	19.23%	26.97%	30.3%	17.74%	7.81%	8.33%	1.52%	3.17%
State (Georgia)									
Number of Loans	13,031	23,084	22,488	11,180	4,680	2,598	202	968	1,176
Median Loan Amount	\$145,000	\$153,000	\$157,000	\$161,000	\$147,000	\$142,500	\$116,000	\$112,500	\$112,000
Percent of Loans with Tract Inc > 120% MSA Median	10.81%	18.74%	19.94%	12.75%	7.15%	3.09%	1.83%	1.24%	1.53%
National									
Number of Loans	359,736	640,524	636,611	310,051	118,903	76,197	5,569	36,540	42,504
Median Loan Amount	\$157,000	\$191,000	\$200,000	\$198,000	\$152,000	\$140,000	\$120,000	\$124,000	\$137,500
Percent of Loans with Tract Inc > 120% MSA Median	8.82%	16.71%	19.76%	11.99%	5.96%	2.7%	1.54%	1.25%	1.65%

(-) Originations for Purchase:

Purchase Originations

In 2011, the typical loan originated for the purchase of a home was for **\$91,000**.

Purchase	2004	2005	2006	2007	2008	2009	2009Q4	2010	2011
All Purchase									
Number of Loans	188	257	232	146	77	82	-	98	75

Median Loan Amount	\$110,500	\$120,000	\$118,000	\$112,000	\$114,000	\$97,000	--	\$109,000	\$91,000
Percent of All Loans	50%	60.05%	63.04%	54.28%	38.5%	35.65%	--	44.95%	38.07%
High-Cost Purchase									
Number of Loans	17	41	35	15	8	6*	0	1	2
Median Loan Amount	\$115,000	\$95,000	\$124,000	\$121,000	\$216,500	\$109,000*	N/A	N/A	N/A
Percent of Purchase Loans	9.04%	15.95%	15.09%	10.27%	10.39%	10.34%*	0%	1.02%	2.67%
Prime Purchase									
Number of Loans	171	216	197	131	69	52*	24	97	73
Median Loan Amount	\$110,000	\$120,000	\$116,000	\$112,000	\$110,000	\$100,500*	\$95,500	\$107,000	\$91,000
Percent of Purchase Loans	90.96%	84.05%	84.91%	89.73%	89.61%	89.66%*	100%	98.98%	97.33%

*Indicates data for 2009Q1 - 2009Q3 only.

Piggyback Purchase Loans by Loan Type

Piggyback loans, also known as 80-20 loans, are multiple mortgage transactions, where a buyer obtains at least two loans in order to purchase a home. The second loan finances that part of the purchase price not being financed by the first loan. The 80-20 or piggyback loan has been used to avoid underwriting standards held by most lenders that require private mortgage insurance (or PMI) when less than a 20% down payment is made by the buyer. Studies suggest that these transactions have a higher risk of default and foreclosure as the homebuyers have little or no equity at risk. HMDA data does not explicitly identify 80-20 or piggyback loans; this is an analytic performed by TRF.

The typical piggyback loan for the purchase of a home in this area was for **N/A**, and made up **0%** of purchase loans made here. Across all purchase loans, the median purchase loan amount was for **\$91,000**.

Piggyback Loans	2004	2005	2006	2007	2008	2009	2009Q4	2010	2011
Total									
Number of Loans	8	35	44	10	0	0	--	1	0
Median Loan Amount	\$131,500	\$123,000	\$134,500	\$133,000	N/A	N/A	--	N/A	N/A
Percent of Purchase Loans	4.26%	13.62%	18.97%	6.85%	0%	0%	--	1.02%	0%
High-Cost Piggyback Loans									
Number of Loans	3	12	7	2	0	0*	0	0	0
Median Loan Amount	N/A	\$122,000	\$126,000	N/A	N/A	N/A*	N/A	N/A	N/A
Percent of Piggyback Loans	37.5%	34.29%	15.91%	20%	0%	0%*	0%	0%	0%
Prime Piggyback Loans									
Number of Loans	5	23	37	8	0	0*	0	1	0
Median Loan Amount	\$134,000	\$125,000	\$136,000	\$149,000	N/A	N/A*	N/A	N/A	N/A
Percent of Piggyback Loans	62.5%	65.71%	84.09%	80%	0%	0%*	0%	100%	0%

*Indicates data for 2009Q1 - 2009Q3 only.

(-) Loans for Manufactured Housing

Loans for Manufactured Housing

Loans for the purchase or refinance of manufactured housing, also known as mobile homes, are often structured differently than for conventional housing, and so are presented as a separate category in PolicyMap.

In this area, there were **1** loans originated for manufactured housing in 2011, representing **0.51%** of the total loan activity.

Manufactured Housing Loans	2004	2005	2006	2007	2008	2009	2010	2011
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City (Dalton)								
Number of Loans	7	1	2	3	1	0	0	1
Median Loan Amount	\$20,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Percent of All Loans	1.86%	0.23%	0.54%	1.12%	0.5%	0%	0%	0.51%
State (Georgia)								
Number of Loans	7,853	7,437	7,747	7,914	6,872	4,842	3,894	3,771
Median Loan Amount	\$53,000	\$56,000	\$57,000	\$58,000	\$52,000	N/A	\$45,000	\$44,000
Percent of All Loans	2.27%	2.1%	2.31%	3.01%	3.63%	2.15%	2.21%	2.21%
National								
Number of Loans	218,420	210,015	208,112	198,419	162,704	122,341	97,948	89,193
Median Loan Amount	\$60,000	\$65,000	\$67,000	\$69,000	\$68,000	N/A	\$62,000	\$61,000
Percent of All Loans	1.83%	1.78%	2.02%	2.5%	2.82%	1.55%	1.43%	1.48%

While **0.51%** of loans in the area were for manufactured housing, this category represented **0.57%** of the loans to Whites, **0%** of loans to African Americans, **0%** of loans to Asians, and **0%** of loans to Hispanics.

Manufactured Housing Loans	2004	2005	2006	2007	2008	2009	2010	2011
Loans to Whites								
Number of Loans	6	1	2	3	1	0	0	1
Median Loan Amount	\$20,000	N/A						
Percent of Loans to Whites	1.88%	0.27%	0.63%	1.24%	0.55%	0%	0%	0.57%
Percent of Manufactured Loans	85.71%	100%	100%	100%	100%	0%	0%	100%
Loans to African Americans								
Number of Loans	0	0	0	0	0	0	0	0
Median Loan Amount	N/A							
Percent of Loans to African Americans	0%	0%	0%	0%	0%	0%	0%	0%
Percent of Manufactured Loans	0%	0%	0%	0%	0%	0%	0%	0%
Loans to Asians								
Number of Loans	0	0	0	0	0	0	0	0
Median Loan Amount	N/A							
Percent of Loans to Asians	0%	0%	0%	0%	0%	0%	0%	0%
Percent of Manufactured Loans	0%	0%	0%	0%	0%	0%	0%	0%
Loans to Hispanics								
Number of Loans	3	1	1	0	1	0	0	0
Median Loan Amount	N/A							
Percent of Loans to Hispanics	2.56%	0.6%	0.78%	0%	1.67%	0%	0%	0%
Percent of Manufactured Loans	42.86%	100%	50%	0%	100%	0%	0%	0%
Loans to Nonhispanics								
Number of Loans	4	0	1	3	0	0	0	1
Median Loan Amount	N/A							
Percent of Loans to Nonhispanics	1.8%	0%	0.47%	2.01%	0%	0%	0%	0.71%
Percent of Manufactured Loans	57.14%	0%	50%	100%	0%	0%	0%	100%

(-) Endnotes:

All data provided in this report is derived from a public database of lending activity, collected by the FFIEC and mandated by the Home Mortgage Disclosure Act (HMDA) of 1975. HMDA requires most mortgage lenders located in metropolitan areas to collect data about their housing-related lending activity, report the data annually to the government, and make the data publicly available.

Data in this report include originated loans made for the purchase and refinance of owner-occupied, one-to-four family dwellings, or, where specified, for the purchase or refinance of manufactured housing. When performing aggregations and calculations on the HMDA data, medians were not calculated and percents were not computed where the count of loan events of that type or the denominator of the calculation was less than five. These places are identified on the map as having Insufficient Data. If a cell in a table contains N/A, the data are not available or have been suppressed according to these rules.

Depending on the size of the area selected for this report, the above values capture data for the census tracts, counties, etc, in which at least 50% of their areas are contained. For custom areas, such as radii, custom regions, school districts, and political districts, the HMDA data in this report was calculated by summing the following component Cities in 2000: **Dalton**. For more information on HMDA data in PolicyMap, see the related entries for HMDA (Home Mortgage Disclosure Act) in our [Data Directory](#).

PolicyMap contains HMDA data for 2004 through 2011. The 2011 HMDA data reflect the ongoing difficulties in the housing and mortgage markets that began appearing in 2007. Users will find sharp decreases in originations, regardless of race, ethnicity or income. Users will also see an understated decline in higher priced loans (those PolicyMap previously classified as subprime and now classifies as high cost) as a result of widening rate spreads. Additionally, the higher incidence of FHA lending activity in the second half of 2008 and the entire years of 2009, 2010 and 2011 will be apparent in the government-insured home loan data. For more information and analysis of the 2011 HMDA data, see the published draft of an article that is forthcoming in the Federal Reserve Bulletin, available at http://www.federalreserve.gov/pubs/bulletin/2012/PDF/2011_HMDA.pdf.

Two changes implemented in the processing of the 2009 HMDA data include: 1. Separation of 2009Q1-2009Q3 from 2009Q4 lending data concerning rate spread reporting (high-cost and prime loans), and 2. Suppression of median home loan amounts for manufactured home loans. The separation of data for the first three quarters of 2009 from the last quarter for loans with or specifically without rate spreads is due to the fact that HMDA changed its rules for reporting rate spreads in the fourth quarter of 2009 in an effort to more accurately capture the current high-cost lending activity. The suppression of median home loan amounts for manufactured homes is due to the high incidence of error notations in the manufactured home loan data in 2009. In the 2010 and 2011 data, all information regarding loans with or specifically without rate spreads is reported according to the 2009Q4 reporting rules. Because of the relative lack of error notations in the manufactured home loan data in 2010 and 2011, median manufactured home loans were only suppressed in cases where the count of loan events of that type or the denominator of the calculation was less than five.

Further description of the source of the data and the terms used in the report can be found in the [Data Directory](#), or from HMDA at <http://www.ffiec.gov/hmda/>.

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HMDA Report by Pre-defined Location for Dalton (City)
04/14/2014
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Fair Housing Complaints



U. S. Department of Housing and Urban Development
Regional Administrator
Region IV

August 9, 2013

Ms. Brittany McEntire
CDBG Program Manager
City of Dalton
300 West Waugh Street
Dalton, GA 30720

Dear Ms. McEntire:

SUBJECT: Freedom of Information Act Request
FOIA Control No: 13-FI-R04-01966

This is to acknowledge receipt of your FOIA request dated July 23, 2013. You are requesting the total number of open and closed housing discrimination complaints for the city of Dalton, Georgia for the years 2003 through May of 2013.

When responding to a FOIA request, the Department of Housing and Urban Development searches for responsive documents existing up to the date the request is received by our office. We received your request on August 8, 2013. You should receive a response within twenty business days from the date your request was received. There may be a charge for these documents to cover the costs of the search and reproduction, which will be determined once the documents have been received.

For your information, your FOIA request, including your identity and any information made available is releasable to the public under subsequent FOIA requests. In responding to these requests, the Department does not release personally identifiable information, such as home address, telephone number or social security number, all of which are protected from disclosure under FOIA Exemption 6.

Thank you for your interest in the Department's programs and policies. If you have any questions regarding this letter, please contact Mr. Gabe Daugherty at William.G.Daugherty@hud.gov or (678) 732-2378.

Sincerely,

A handwritten signature in black ink that reads "Karen Jackson Sims".

Karen Jackson Sims
Deputy Regional Administrator

Inquiry Number/Case Number/Case Name	Basis	Issue (s)	Why Inquiry/Claim Closed	Dollar Amount of Settlement
170699 / Harty, Joy vs. Housing Authority of the City of Dalton	No Basis	Discrimination in Terms/Conditions/privileges relating to rental	Closed Failure to respond by Claimant, 08/06/2004	N/A
199816 / Nails, Denise v. Dalton Housing Authority	No Basis	No issue mentioned	Closed No valid issues, 12/05/2005	N/A
201698 / Hayes, Sean v Dalton Housing Authority	No Basis	No Issue mentioned	Closed No valid issues, 01/09/2006	N/A
185477 / 04-05-0937-8 Isabel Martinez v. Stone Ridge Apartments	National Origin/ Hispanic or Latino	Discriminatory terms, conditions, privileges, or services and facilities/Other discriminatory acts	Closed No cause determination, 06/30/2006	N/A
306534 / 04-10-1743-8 Patterson, Anthony Steve vs. Stone Brooke Apartments	Mental/Physical Disability	Discrimination in terms/conditions/privileges relating to rental	Closed Complainant failed to cooperate, 08/10/2011	N/A

