



Building in Good Faith

Faith Based Affordable Housing Design Studio Report
School of City and Regional Planning
Georgia Institute of Technology
Fall Semester 2022



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Faith Based Affordable Housing Studio

Fall Semester 2022
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Table of Acronyms

AME	African Methodist Episcopal
AMI	Area Median Income
CDBG	Community Development Block Grants
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CLT	Community Land Trust
CME	Christian Methodist Episcopal
CPC	Central Presbyterian Church
CRA	Community Reinvestment Act
CSI	Congregation Shearith Israel
DHPC	Druid Hills Presbyterian Church
DOJ	United States Department of Justice
FAR	Floor-area ratio
FBAH	Faith based affordable housing
FBDI	Faith Based Development Initiative
FBO	Faith based organization
FHA	Fair Housing Act
Georgia DCA	Georgia Department of Community Affairs
GPGBC	Greater Piney Grove Baptist Church
HHS	United States Department of Health & Human Services
HOB	Housing Opportunity Bonds
HUD	United States Department of Housing & Urban Development
JV	Joint Venture
LIHTC	Low Income Housing Tax Credit
LLC	Limited Liability Corporation
MDA	Master Development Agreement
MOU	Memorandum of Understanding
MRC	Mixed residential and commercial zoning
NMTC	New Markets Tax Credit
OZ	Opportunity Zone
PBRA	Project Based Rental Assistance
RFP	Request for Proposal
RG	General (multi-family) residential zoning
SDA	Seventh Day Adventist
SPI	Special Public Interest
sqft.	square feet
SUP	Special Use Permit
TAD	Tax Allocation District
TDR	Transfer of Development Rights
VCHHM	Vine City Housing and Health Ministry

Acknowledgments

This report is the result of a semester-long studio on faith based affordable housing (FBAH) in Fall 2022. We explored the policies, funding, and history, of faith based organizations' (FBOs) affordable housing initiatives and worked with four organizations to develop urban design proposals for their sites. To provide a comprehensive document, we engaged many people over the last five months and are thankful for their time, ideas, historical reflection, and personal stories. Without your thoughtful input, we could not have made this happen.

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- Joe Collums

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- Betsy Turner
- Eric Dusenbury
- Elizabeth Acton

Central Presbyterian Church

- Gary Cornell
- Jerry Miller

Faculty

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Introduction

Atlanta needs quality, stable, affordable housing. For decades, policymakers, private sector developers, and funders have failed to come together to design policy that sustainably, reliably addresses the issue of housing availability and precarity in the city. Many policies even seem to exacerbate the issue, leading to further displacement and encouraging limitless rises in housing prices for renters and homeowners alike. Atlanta Mayor Andre Dickens' administration has announced a commitment to affordable housing production and identified housing as an area of high priority for his first term. One group that has been called upon to contribute to the efforts are faith based organizations (FBOs), whose vast land holdings in the city are identified as important assets to address the problem. With the Mayor's Faith Based Development Initiative and a handful of lighthouse projects by some of Atlanta's historical churches, FBOs have been recognized as mission-driven, long-term, trustworthy institutional actors - ideal partners to contribute to the city's housing efforts.

Georgia Tech's Faith Based Affordable Housing studio is an urban design studio led by Aaron Fortner, AICP, that investigates the high-level goals, opportunities, challenges, and realities that communities of faith face when getting involved with housing development. To ground our work, we are partnering with four houses of worship to understand their missions and site-specific needs. In addition, we also use this opportunity to honor the long legacy of faith-based organizations that have and continue to serve the housing needs of Atlanta's communities. We are a group of six graduate students within Georgia Tech's School of City and Regional Planning. Our skills and specializations range from housing, GIS and mapping, policy analysis, economic development, urban design, land use, and environmental health.



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FBAH 101

An overview of the policies, practices, programs,
and projects surrounding faith based affordable
housing.

Policy Landscape

City of Atlanta

Responding to an affordability crisis

Housing costs in the Atlanta area have risen faster in the post-Recession decade than almost any other major metropolitan area in the country. Not only has a sharp rise in median rental and homeownership prices since 2012 squeezed the pocketbooks of middle class residents, the sharp decline in housing units available for under \$800/month continues to push out low-income residents and reduce opportunities for new low-income residents to move in. In 2019, 70% of extremely low-income residents were rent-burdened, as were 71% of residents making less than 80% AMI¹. Housing costs serve as the basis of city life; when housing prices rise, neighborhoods are reshuffled, vulnerable residents are displaced, life is more precarious, and more time is spent working to cover housing than dedicating to other priorities.

Housing unaffordability stands in a long legacy of housing precarity issues that have transformed and continue to affect the city. Urban renewal, white flight, HOPE VI, gentrification and the foreclosure crisis all belong to the list of historical destabilizing factors for Atlanta's neighborhoods and its neighbors.

It is no surprise that the affordability crisis has impacted low-income and black neighborhoods the most. Housing prices have risen precipitously high in predominantly Black and low- to middle-income areas. Much of this growth has been spurred by public investment projects, most famously the Atlanta BeltLine. In the eastern BeltLine neighborhoods, gentrification and neighborhood churn have accounted for a 10 percentage point increase in non-Hispanic white and college-educated residents despite these neighborhoods' historic multi-racial working-class demographics².

At the same time, the City has built down its



Figure 1. HUD Secretary Fudge's visit to Atlanta to discuss faith based development. From left to right: Representative Nikema Williams, HUD Secretary Marcia Fudge, Mayor Andre Dickens and Senior Advisor to the Mayor, Courtney English. Source: Atlanta Civic Circle

capacities to construct and manage affordable housing itself. The home of the nation's first public housing program has become – through the HOPE VI program, shifting priorities for the Atlanta Housing Authority (rebranded as Atlanta Housing to reflect its changing mission), and decades of privatization – almost completely reliant on scarce federal and state tax credits and private-sector actors to address the city's shortage of affordable housing. The ability for the City of Atlanta to exert downward pressure on market prices through public intervention has been compromised over the years, and the City's current tools have been largely inadequate to surmount the magnitude of the problem.

In 2021 Mayor Andre Dickens made affordable housing production and preservation a key campaign issue and goal of his first term. The City is currently campaigning to have 20,000 affordable housing units built or preserved by 2030. Among other programs, the City has launched its Faith Based Development Initiative to empower faith based organizations to contribute a 10% tithing (2,000 units) to this goal.

The Mayor's Faith Based Development Initiative

In February 2023, Mayor Dickens announced the Faith Based Development Initiative to encourage and facilitate the development of affordable housing on land owned by houses of worship. Led by the Department of City Planning's Office of Housing and Community Development, the goal of this initiative is to connect faith based organizations with one another and with other development professionals to create a pipeline for developing affordable housing on land owned by houses of worship. The initiative puts the topic of faith based affordable housing on the City's political agenda and also serves as a platform to provide financial and legal support to interested FBOs.

The Faith Based Development Initiative currently has a pipeline of 32 congregations, ranging from early ideation and vision-setting to breaking

ground on multifamily properties. In 2022, the initiative has targeted houses of worship in the earliest phases of development and is meant to provide pre-development and due diligence assistance. In addition to participating FBOs, the initiative has developed a database of professionals and non-profits interested in partnering with FBOs.

In monthly public workshops, professionals, service providers, and other FBOs present on a wide range of topics intended to give participants a broad vocabulary and inspiration on

development-related topics.

In December 2022, Invest Atlanta, the City's economic development authority, announced a \$500,000 grant program for early stage houses of worship seeking to build affordable housing. Further policy proposals include expedited permitting, zoning changes, and hands-on development crash courses, in addition to funding and networking opportunities.

Getting National Attention

In Fall 2022, HUD Secretary Marcia Fudge visited Atlanta and other Georgia cities to meet with faith leaders about affordable housing development (Figure 1). Although to date, no new programs have been announced by HUD or other federal agencies to facilitate faith based housing initiatives, the work of Enterprise Community Partners (see Box 1) and cities like Atlanta have put the conversation on the national agenda.

Box 1: Enterprise leads the way

In 2006, Enterprise Community Partners launched its Faith Based Development Initiative in the Mid-Atlanta region, centered around the group's Washington D.C. office. By no means the first faith based housing effort in the country, the initiative sought to establish a programmatic approach to developing FBOs' unused and underused land for affordable housing in the city.

Enterprise's annual cohort model includes workshops and trainings for participating FBOs on topics such as community engagement, deal structuring, financial resources, and one-on-one vision building. Program participants can receive \$10,000 market study and feasibility grants, and \$40,000 recoverable pre-development grants.

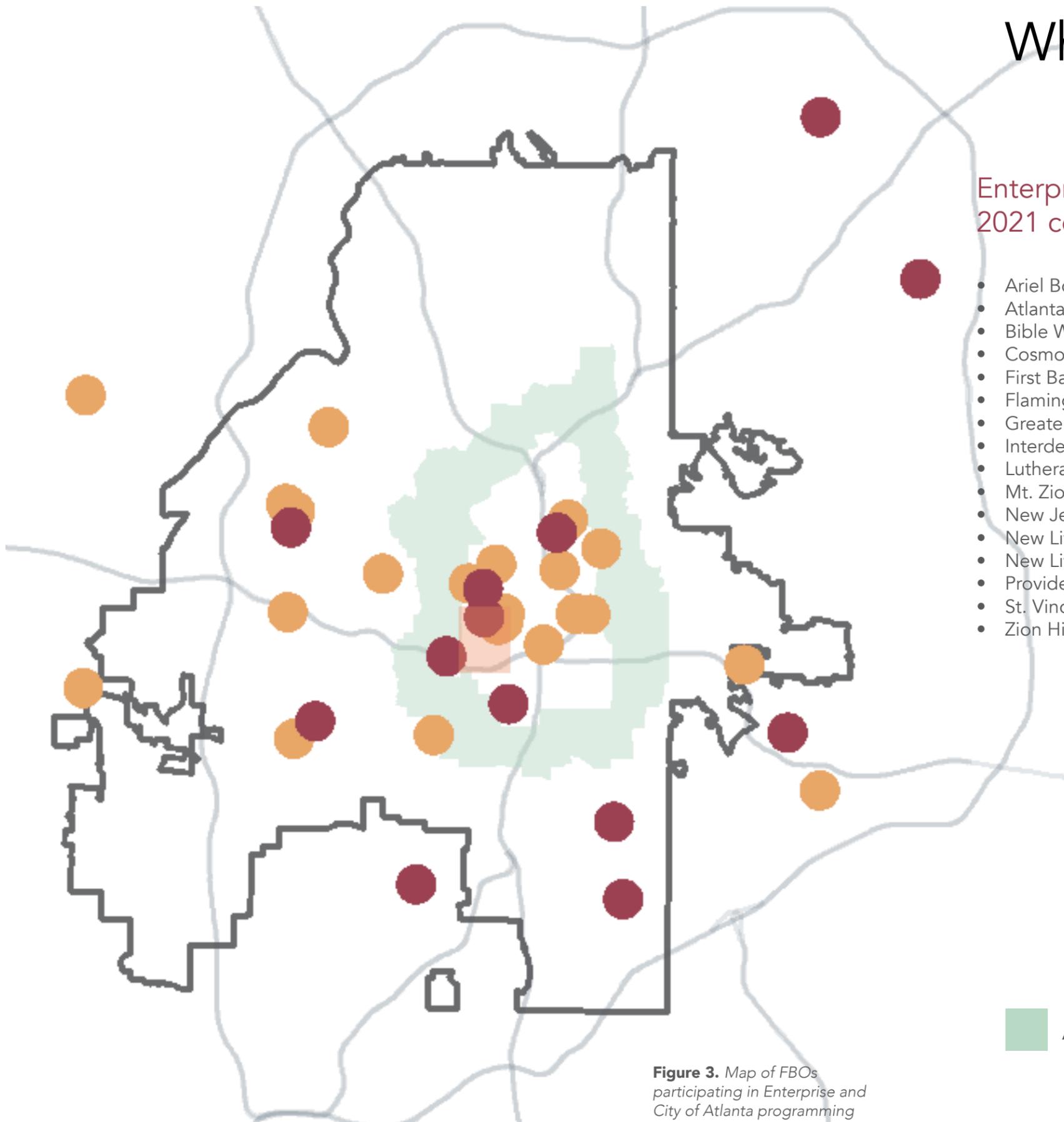
Since 2006, Enterprise has expanded



Figure 2. Enterprise FBDI Program Elements. Source: Enterprise Community Partners

its Faith Based Development Initiative into 11 regions. Their Southeast region launched in Atlanta and Miami, in 2021 with cohorts of 16 and seven houses of worship respectively.

Who's trying to build in Atlanta?



Enterprise Community Partners 2021 cohort

- Ariel Bowen United Methodist Church
- Atlanta Good Shepherd Community Church
- Bible Way Ministries, International
- Cosmopolitan A.M.E. Church
- First Baptist Church Gresham Road
- Flaming Heart Ministries
- Greater Turner Chapel A.M.E. Church
- Interdenominational Theological Center
- Lutheran Church of the Redeemer
- Mt. Zion Baptist Church of Carey Park
- New Jerusalem SDA Praise and Worship Center
- New Life Presbyterian Church
- New Life Tabernacle Church of God in Christ
- Providence Missionary Baptist Church of Atlanta
- St. Vincent de Paul Georgia
- Zion Hill Community Development Corporation

City of Atlanta's Faith Based Development Initiative active congregations

- Allen Temple A.M.E Church
- Antioch Baptist Church
- Atlanta First United Methodist
- Big Bethel A.M.E. Church
- Cathedral of Faith
- Central United Methodist Church
- Crown of Glory Missionary Baptist Church
- Faith and Prayer Pentecostal Church
- First Mt Pleasant Baptist Church
- Fort Street United Methodist Church
- Friendship Baptist Church
- The Grove Community Development Corporation
- Hillside International Truth Center
- Holy Spirit Missionary Baptist Church
- New Horizons Baptist Church
- Norwood Tabernacle Baptist Church
- Quest Community Development
- St Mark United Methodist Church
- Trinity United Methodist Church
- Turner Chapel A.M.E. Church
- Victory International Center (Redeemed Christian Church of God)
- Virginia Highland Church
- West Mitchell C.M.E. Church

And other statewide denominations with local churches

Atlanta BeltLine area overlay

Figure 3. Map of FBOs participating in Enterprise and City of Atlanta programming

Partnering with FBOs

FBOs decide to develop housing and housing services for many reasons – some of which result in having to make hard choices in the process. For many religious organizations, building housing corresponds with the congregation’s mission to provide shelter, care for the poor, and build stronger communities. As a financial asset, housing can be closely tied up in the health and long-term viability of an FBO’s finances, which leadership and congregations strive to strengthen. For many congregations, land and control of land are deeply connected with the identity of the church, the legacy of its previous generations, and its hopes for the future. Some FBOs are forced to redevelop to overcome code violations and other local regulations. Each FBO will balance and prioritize these objectives differently – resulting in different outcomes.

FBOs’ existing structures, faiths, objectives, and administrative structures also impact how an FBO will develop. Countless stories describe how the slow consensus-building and moving-at-the-speed-of-trust that most FBOs require runs counter to the expected pace of real estate development. Their inexperience can lead them to expect the impossible – while their perseverance, relationships, tenacity, and faith can often help them achieve it. No FBO develops alone, and a big task for FBOs is getting other partners and institutional actors to value all the assets they bring to the table, as well as to know when it is time to follow the accepted expertise of others.

More than Just Land

Much of the push to have FBOs more involved in housing is focused on one key asset: land. One recent report estimates that FBOs directly control over 6,500 acres of land across more than 3,000 properties, much of which is in rapidly developing areas in the city³. While FBOs’ land holdings certainly give them a seat at the table, focusing on this asset alone has two negative consequences. First, it can lead FBOs and others

to overlook the many assets they provide to development partners. This can lead FBOs to demand less than their fair share of development yields, or risk ceding too much in negotiations. On the other hand, a strict focus on land can lead congregations with little to no land to exclude themselves from the current conversation, unsure of how they too can contribute.

Community Trust

FBOs are frequently leaders in their communities and with that comes well-established trust. Neighborhood FBOs in particular are seen as pillars in their communities and stewards these relationships. For example, for years, Atlanta Berean Seven-Day Adventist Church in West Atlanta, has provided a weekly food drive available to all people in need. The majority of recipients are from the surrounding neighborhoods. Services and outreach create a bond between FBOs and their communities. For developers, trust, community connection, and local standing is vital to have, difficult to gain, and fragile to keep. Builders gain priceless insight and can head off problems when they work with an FBO that has the trust of its community. Rather than take this trust for granted, FBOs can invoke it to strengthen their position in a development agreement.

Political influence

Houses of worship have contributed to countless housing policies at all levels of government. The Southern Christian Leadership Conference played a large role in advancing the 1968 Fair Housing Act, while the American Friends Society paved the way for the USDA’s Rural Development Services, and Enterprise Community Partners has lobbied for and even co-written numerous rule changes that have increased access to capital in low-income areas, including LIHTC. Washington D.C.’s New Community Church led the charge to establish that city’s Housing Production Trust Fund and continues to monitor its funding. Even small local policies such as zoning variances can be changed if a strategic FBO and its congregation put political pressure in the right places.

Social Capital and Know-How

FBOs often have strong social capital within their congregation and through their networks. Development requires strong partnerships to get projects done on mission, on budget, and on time. FBOs can look to their networks to find many resources that can be offered either pro-bono or at a below market rates. In 2006, Focused Community Strategies, an Atlanta faith based organization, was able to redevelop the historic Stockade building into very low-rent apartments with no debt, relying almost entirely on donated professional labor⁴. Parishioners who are in real estate, or lawyers, city planners, accountants, members working in construction or technical trades, or even just those with strong administrative skills, can provide council and services to FBO-led projects. Externally, most churches have ongoing relationships with other FBOs, community leaders, and local government, which serve as unexpected sources of help in difficult times. In development, social capital - who you have trusted relationships with - is often as valuable as financial capital.

A Legacy of Movements

While increasing the supply of affordable housing is important, the problem will not be solved without legislative and cultural changes. Black churches in Atlanta have repeatedly used their resources, human capital, and monetary capital to disrupt unfair policies, economic practices, and cultural norms, ranging from Jim Crow policies to redlining in the 1980s. Even FBOs that do not have the capacity to lobby government directly for housing policy changes can contribute resources like small donations, volunteer hours, common space and even pulpit “air-time” to housing-related issues. All of these small contributions add up. And although FBOs are often criticized that their decision-making timeframes do not align with development schedules, countless case studies demonstrate that deliberation, commitment to a community, prayer, willingness to be flexible, and perseverance have beaten the odds and allowed the most impossible projects succeed.

Is supply the issue?



Conventional wisdom in Atlanta attributes the drop in affordability to a gap between demand for housing and local supply. Both the US Census and City of Atlanta have published a drop in affordable stock in the last half decade⁵. Demographic changes have followed this drop. The natural policy response is clear: build more. Acknowledging other factors that contribute to the current crisis, however, can point to other policy responses and areas where FBOs can get involved.



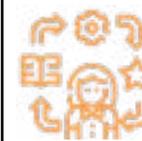
Institutional investors: Since 2012, Atlanta has had one of the nation’s highest concentrations of institutional investors in single family rental housing. During the pandemic, institutional investors represented over 30% of all sales in some zip codes. Institutional investors repair less, raise prices higher, and evict more than other landlords⁶.



Short-termism: Treating housing like a financial investment rather than a place to live increases speculation, poor property management, and impatience with tenants experiencing difficulties. Patient capital and partners can change how deals are structured, slow down the process, and build stronger communities.



Displacement and Eviction: Tenant-landlord law in Georgia is landlord-friendly, and state law preempts local governments from creating stronger tenant protections. Atlanta-area courts are eviction-friendly, and tenant organizing in Atlanta still remains weak, creating fewer safeguards against eviction than other US cities.



Know-how and capacity: Atlanta housing policy over the years has resulted in a departure of the public sector from building and operating housing. State policy creates barriers to federal housing subsidies that leaves a gap in skills and know-how among public-good-oriented actors.

Case Studies

Atlanta is currently a hot bed of faith based development. Select case studies document recent activities and give details of how they do it

Spotlight: Atlanta First United Methodist



Figure 4. Proposed improvements of First United Methodist Church's 360 Peachtree Development. Source: Invest Atlanta

Overview

Labeled by the Mayor as a “God-size” vision, Atlanta First United Methodist Church’s 360 Peachtree St. development in Downtown, led by Pastor Jasmine P. Smothers, is the first lighthouse project associated with the City’s Faith Based Development Initiative. The project consists of two phases: The “Podium,” a 5-story building with a school, fellowship hall, church offices, and commercial retail and two residential towers. Of the Building’s 320 units, 192 will be affordable at 31% - 60% AMI, and 80 will be affordable at 30% AMI.

History

Atlanta First UMC is one of the city’s oldest churches, recently celebrating its 175th anniversary. The church’s Wesley Chapel was built in 1847, followed by a Gothic cathedral in 1870 and finally the current Stone Mountain granite building in 1903. In 2017, the church announced the redevelopment of 360 Peachtree. A Request for Proposals (RFP) issued in 2018 led to selecting Evergreen Real Estate out of Chicago as its non-profit development partner. The project broke ground in November 2022.

Funding and Structure

The residential portion of the project’s \$140-million price tag is roughly \$95-million and has applied for 4% tax credits. \$49-million in tax-exempt bonds were awarded by Invest Atlanta, and tax credit equity, if the application is successful, will generate another \$30-million in equity for the project. The project is structured as a joint venture between First United and Evergreen, and the church has conveyed development rights to the JV via a ground lease to retain permanent ownership. The church has negotiated to retain a say in the management and use of the property.

Spotlight: Sweet Auburn Revival



Figure 5. Wheat Street Senior Tower after redevelopment. Source: Wheat Street Baptist Church

Overview

Big Bethel African Methodist Episcopal (A.M.E.) and Wheat Street Baptist Churches are each continuing to develop in the Sweet Auburn neighborhood. Big Bethel’s plans for their 2.5 acre campus, after a decade of changes, now include 300 units of housing (without an explicit affordability commitment), a parking deck, commercial spaces, and a Family Life Center. Wheat Street intends to use its land to pursue smaller and mid-sized development on its over nine acres, with an unspecified amount reserved for affordable housing. Each church recently completed rehabilitation of its residential towers with The Benoit Group (TBG); the projects are co-funded by Atlanta Housing under the Project Based Rental Assistance (PBRA) program for deep affordability. The planned development costs between the two churches are set to exceed \$400-million.

History

Four prominent civil rights churches, Ebenezer Baptist, Wheat Street Baptist, Big Bethel A.M.E., and Butler Street Baptist Churches, have existed in and around the Sweet Auburn neighborhood for over a century. In the decades after urban renewal, I-75/85 construction, and racial integration, the churches began a proactive land acquisition program to continue a legacy of strengthening Black life, business, and community in the neighborhood. All four began providing affordable housing in the 1960s and 1970s. Wheat Street Gardens was the nation’s first federally supported faith based housing project, completed in 1963. The Wheat Street Towers and Big Bethel Towers followed in the early 1970s and together provide almost 400 units of affordable housing for families and seniors.

Funding and Structure

Big Bethel and TBG are structured as a JV on a 99-year ground lease to ensure permanent ownership of the campus property. Big Bethel issued an RFP to decide on a development partner, and a Memorandum of Understanding (MOU) with the church, developers and local stakeholders will ensure that the developments honor the architectural and historic legacy of the area. Wheat Street Charitable Foundation is the church’s 501(c)3, which operates and manages its residential properties independently from the church and shields it from financial liability.

Spotlight: Friendship Baptist Church



Figure 6. Friendship Baptist Church campus, Vine City-
Source: Downtown West Development Board

Overview

Friendship Baptist Church (FBC), through Downtown West Development (DTW), is currently developing its 19-acre site near the church sanctuary. The site, which consists of six parcels, is close to many key amenities in the city including Downtown Atlanta, the Mercedes Benz Stadium, Centennial Olympic Park, and the Atlanta University Center. The church is looking to develop a mixed use commercial center that includes street-front retail and services that are beneficial to the neighborhood, community-oriented space, and mixed-income residences of various types. Specifically, FBC is looking to diversify its housing to include flats, townhomes, mid- and possibly high-rise units, with a total goal of 314 housing units. FBC is aiming for 15% to 30% of units to be affordable, with rent targeting 30% to 80% AMI. They plan to have rental and purchase options with deed restrictions ensuring affordability for a minimum of 30 years.

History

Established in 1862, FBC is an important historical institution in Atlanta and has played a significant role in the development of the west side. Morehouse and Spelman Colleges both started in the basement of Friendship. Its housing ministry has provided affordable housing units for decades including E. R. Carter Old Folks Home, the Samuel W. Williams/Friendship Center Apartments (208 units), and the William V. Guy Tower High-rise for the Elderly and Handicapped (102 units).

Funding and Structure

DTW will ground lease the property from FBC. DTW and the selected development team will enter into an agreed upon Master Development Agreement (MDA), which will detail the development process by phase, timing, funding and ownership structure, immediate and future financial payouts, land ownership as well as rights and responsibilities. DTW will also require community input and community consideration in the project design. Design, development and construction will conform to the City's Minority and Female Business Enterprises plan and meet minimal environmental and sustainability standards.

God-sized in all sizes

Affordable housing comes in different shapes and sizes throughout the city and targets a variety of people. While the largest projects inspire awe and house many people, mid- and smaller-size projects are just as important to achieve housing goals. In Atlanta, faith based organizations have found creative ways to create affordable housing of all sizes and for different areas of need.

First United Methodist College Park ION College Park

College Park First United Methodist Church was built over 125 years ago and has served as a staple in its community ever since. In conjunction with the City of College Park, MARTA, eightvillage, Good Places, and KNGDM Group, the church is embarking on an 80-unit complex with lofts for artists. The transit-oriented, art-driven development, ION College Park, will create a community for artists to have access to resources as well as long-term affordable housing.

ION College Park has a unique primary focus: to provide stronger economic mobility for artists and residents in the community. The complex will have rented commercial spaces, 24/7 access to art studios for different mediums, commercial kitchen access, three performance venues, five rehearsal spaces and other amenities. The complex's housing will include ownership as well as rental units with both residential and studio units priced at affordable rates.



Figure 7. First United Methodist - College Park Proposal
Source: Urbanize Atlanta

Cosmopolitan A.M.E.

Cosmopolitan A.M.E. is currently searching for a partner to help realize a small-scale, 5-10 unit housing development on its site located in a prime location near the Atlanta University Center. The church, located at a recently declared Westside Superfund site, will also have to deal with lead remediation in the soil - a reminder of a history of environmental injustice in the city. The brownfield site may qualify the development for EPA brownfield grants, a possible alternative initial funding source for future development.

Cosmopolitan created a development committee to draft a 6-part mission: (1) uncompromising developer integrity, (2) collaborative leadership, (3) candid communication, (4) disciplined growth, (5) purposeful innovation, and (6) intentional stewardship. The church brought these principles to a full congregation vote. Documenting their vision allows the church to present a united narrative when dealing with partners and hold itself accountable through the development process.



Figure 8. Cosmopolitan A.M.E. Church Building, Vine City
Source: Locations Hub

Greater Piney Grove Baptist Grove Gardens

The Greater Piney Grove Baptist Church's vision to take its ministry beyond the walls of its building led to the development of its nonprofit The Grove CDC. In 2021, The Grove celebrated the grand opening of Grove Gardens at East Lake, a 70-unit affordable housing community for residents aged 55 and older. The project, financed by the 9% LIHTC program, includes many amenities often found in luxury style apartment complexes.

Grove Gardens shows what happens when vision is shared between an FBO and their development partners. Greater Piney Grove had spent over 15 years trying to develop part of its land to create affordable housing. Initial obstacles provided lessons and gave the church a stronger emphasis on finding the right partner. Their challenges also led them to create The Grove as an independent corporate entity to protect the church from financial liabilities.

After creating The Grove, the first step in their due diligence was to find an honest, reliable affordable housing developer that could share their vision and provide realistic expectations. After interviewing many firms, Georgia Communities, an affordable housing non-profit developer with a history of working with faith based organizations, was chosen. The parties agreed to a 55-year ground lease with a \$1-million upfront ground lease fee. The leases were designed to retain ownership while relinquishing control for the term to Georgia Communities for development and operations.



Figure 9. Grove Gardens Entrance, Source: Miriam Dominguez

Epilogue

A shared mission

Many Atlanta FBOs share an overarching goal: to stabilize their parishes in a rapidly changing city while providing home and shelter for their communities. Gentrification, displacement, and pricing-out are common themes and worries among houses of worship, and a primary driver for pursuing affordable housing.

As FBOs line up to respond to this concern, many questions arise. For churches near Mercedes Benz Stadium: will their congregation be able to survive a drop in revenue received from event parking during construction of housing? For land-rich, cash-poor congregations: how can they ensure that they are receiving the best compensation in exchange for control of their land. For congregations without land: how can they participate in stabilizing themselves and their communities? And for all FBOs: how can they make sure that the decision to build housing does not end up doing more harm than good for their ministry and surrounding community? While no document can answer all these questions, a catalogue of examples can point FBOs to others who have navigated these same concerns in the past.

Catalogue of FBAH

Number of units

Small (0-20): VCHHM Spencer Thurmond Homes,
Habitat for Humanity

Medium (20-100): PGBC Grove Gardens,
Quest Village at English Ave.

Large (100+): First United Methodist: The Podium,
Wheat Street Towers

Construction Type

New Construction: GPGBC Grove Gardens,
First United Methodist College Park

Rehabilitation: Bethel Towers,
VCHHM Vinyards Apartments

Adaptive Reuse: The City of Refuge: the 345
Bethel New Life - BethAnne
Focus Community Strategies -
GlenCastle

Target Population

Families: Antioch Baptist Church: The Madison House

Seniors: Presbyterian Homes of Georgia,
National Church Residences:
Baptist Gardens

Children: Christian City

Transitional (Unhoused): Antioch Baptist Church
North: Matthew's Place,
Rebecca's Tent

Mixed Use: Friendship Baptist Church, Atlanta
First United Methodist

Other: First United Methodist College Park
(artists), The City of Refuge: The
345 (military veterans)

Funding Source

LIHTC 9%: GPGBC Grove Gardens

LIHTC 4%: Wheat Street Towers, Bethel Towers

Grants/Donations: Ebenezer Building
Foundation: Columbia Tower at
MLK, Mercy Housing Southeast,
Georgia Investments in Housing
Grant Program

PBRA: Bethel Towers

Structure

JV with for-profit: Ebenezer Baptist: Columbia
Towers

JV with non-profit: GPGBC Grove Gardens with
Grove CDC

JV with public: VCHHM: Magnolia Perimeter

Ground lease: Friendship Baptist with DTW, Big
Bethel AME future phases

Direct owning: Brooklyn Nehemiah Baptist

Community Land Trust: Charm City Land Trust -
Baltimore

Location

Westside: Quest Village at English Ave, Slmp-
son Street Church of Christ

Eastside: Mercy Housing - Reynoldstown Senior
Apartments

Downtown: The Catholic Shrine of the Immac-
ulate Conception: Bashor Night
Shelter

Southside: Zion Hill CDC Housing

Northside: limited

Building on a Legacy

For decades, Black churches in Atlanta have filled gaps left by governments and the private sector in providing financial, social, housing, and health services to their communities and parishioners. Current FBAH initiatives are not new, but build on a long legacy of faith based housing in the city.

A History of FBAH

As important as local and national initiatives are to supporting faith based affordable housing, these initiatives do not represent a new concept. Throughout history, faith based organizations have regularly provided their parishioners and communities with housing and other social services. [Habitat for Humanity](#), first launched at [Atlanta's Peachtree Presbyterian Church](#), is a prime example of a faith organization that has created an internationally-recognized affordable homeownership program. The Black church has a long legacy as a central institutional presence in communities long neglected by public and private sector actors. In Atlanta, Black churches have mobilized resources to fill the gaps in services left by racially- and politically-motivated disenfranchisement regimes. Events over the last five decades in the city chronicle the Black church's response to racialized local policies and its recurring, often undocumented, involvement in providing affordable housing.

Pre-1970s

Since its rise to national prominence in the 1950s, the Civil Rights Movement has been associated with Black faith leaders. When federally-sponsored "urban renewal" was destroying the fabric of Black communities, Atlanta's Civil Rights churches - [Wheat Street Baptist](#), [Big Bethel A.M.E.](#), [Ebenezer Baptist](#) and [Butler Street C.M.E.](#) - were pushing for equality, justice, and resiliency from the Sweet Auburn neighborhood. Wheat Street's head pastor, [Reverend William Holmes Borders](#), led a vision of holistic development anchored by cooperative economic models and ownership of land. When integration led to the flight of Black professionals from downtown areas to the suburbs and a subsequent devaluation of urban land, Wheat Street capitalized on federal government programs to build housing. In 1963, the church developed the nation's first federally-sponsored faith based affordable housing project: [Wheat Street Gardens](#). Wheat Street advocated a comprehensive view of neighborhood vitality, creating after-school

programs, banking resources, career development and job placement centers, grocery stores, local retail spaces, and recreational outlets around its site. The other Civil Rights churches soon followed suit.

1970s-1980s

By the 1970s, federal agencies began outsourcing and privatizing their housing services, and many Black churches in Atlanta stepped up to take up the yoke⁷. HUD-funded housing projects were built by [Allen Temple A.M.E.](#) and Friendship Baptist on the city's West Side, and additional projects, such as [Bethel Towers](#) and [Wheat Street Towers](#) were erected by the Sweet Auburn churches across town.

From the 1960s to 1980s, prominent federal legislation changed the nation's housing landscape. The Fair Housing Act (FHA) of 1968 made it unlawful to discriminate against borrowers, renters, or homeowners on the basis of race or national origin. Still, banks continued to practice redlining for decades after FHA passed. The Community Reinvestment Act (CRA) of 1977 aimed to curb this behavior, requiring banks to lend to low- and moderate-income communities and families where their branches were located.

Despite these laws, in the 1970s and 1980s, persistent redlining and racist lending practices dominated Atlanta's housing conversation. A 1988 series "[The Color of Money](#)" published by Bill Kovach in the Atlanta Journal-Constitution, prompted churches to take action. In 1989, [Ebenezer Baptist Church](#) organized a coalition of downtown churches to march to redlining banks and remove churchgoers' deposits. The risk of alienating the church as a business partner pressured white banks to increase lending in Black neighborhoods⁸.

During these decades, economic factors began chipping away at Black churches' institutional strength. The War on Drugs, a punitive drug criminalization policy that disproportionately targeted Black Americans, led to the incarceration of many Black men and restructured family dynamics. The church's ministry shifted to prioritize the myriad crises taking over their neighborhoods while also managing their own financial struggles.

As declining membership and a loss of monetary resources weakened the historic position of the Black church, faith-affiliated, non-church organizations began pursuing experimental approaches to community development. Churches founded Community Development Corporations to funnel investment into their neighborhoods. [Methodist Reverend W. Craig Taylor](#) chaired the [South Atlanta Land Trust](#), a first attempt to use an urban land trust to promote permanent housing affordability. These practices helped distance churches from their housing investments in the wake of changes to state and national liability rules that exposed landlord churches to new types of financial risk.

The Olympic Era

The 1990's brought another seismic shift when Atlanta was selected to host the [1996 Summer Olympics](#). Massive infrastructure investments were planned in many of the city's historically Black neighborhoods, including Summerhill, Vine City, English Avenue, and Downtown. Olympic-led Urban Renewal 2.0 not only threatened to displace residents - most famously the city's sizeable unhoused population - it also dispossessed and demolished church buildings themselves. Although the City committed funds to housing and public infrastructure in the "Olympic Ring" neighborhoods, few of these went to Black communities⁹. The anticipated displacement in these neighborhoods led to the formation of the [Vine City Health and Housing Ministry \(VCHHM\)](#), a CDC consisting of 11 local Black churches, in 1986. VCHHM's purpose was to advocate for Vine City in public forums and to fund affordable, long-term housing for residents. VCHHM was able to secure a share of the City's \$10.5-million Housing Trust Fund from the Georgia Dome construction. By 1995, this funding had helped build 28 low-income houses and renovate a 12-unit apartment complex, alongside other community service projects. In 1994, VCHHM was a key contributor for a [\\$250M Empowerment Zone Grant](#) awarded to Atlanta.

2008 Mortgage Lending Crisis

The Great Recession exacerbated inequality between Atlanta's minority and non-minority communities. Atlanta's Black homeowners experienced foreclosure and eviction at a much higher rate than their white counterparts. Research shows how Black churches were targeted by subprime lenders. Capitalizing on a promise of autonomy, "wealth building" and homeownership long withheld from Black communities, as well as on the trusted position of faith leaders, these banks were able to sell predatory mortgages to Black members - even those that qualified for better terms¹⁰. Some lenders even provided incentives through small donations to the church for each predatory mortgage closed. In most cases, the church was not aware they were exploiting their congregation¹¹.

Prior demolition of public housing through the HOPE VI program coupled with mass foreclosures to create an even more acute housing crisis after the Recession. Economic recovery was slow in Atlanta's Black neighborhoods, further increasing economic precarity. During this time, faith based organizations found themselves targeting their housing services around rental and utility assistance to help their members with basic shelter needs.

Development Today

As developers and cities find renewed interest in previously neglected areas, rental prices, property values, and property taxes are spiking in ways that make it difficult for legacy residents to stay in their homes. The continued pace of gentrification and the rapid rise in land and development costs create new challenges for Black churches to stabilize their parishes and communities. Persistent low membership rates equip many congregations with fewer resources than in the past, and many rely more heavily on partnerships with private companies to build. Other churches are cataloguing the assets they can contribute to a housing project, and still others are positioning themselves not as direct developers, but as advocates to lobby for better housing conditions. Mayor Andre Dickens's Faith Based Development Initiative seeks to assist in mobilizing these resources.

KEY FEDERAL AND STATE LEGISLATION

Fair Housing Act of 1968

Civil Rights Act of 1964

Community Reinvestment Act of 1977

Fair Housing Act of 1988

Georgia LLC Act of 1993 (+ nationwide liability laws, 1977 - 2000)

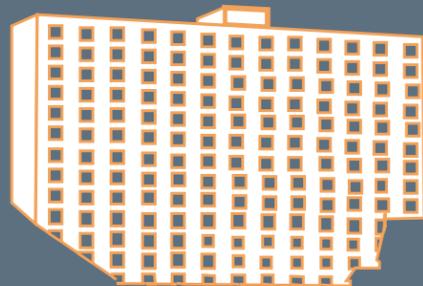
Community Development Financial Institutions Fund of 1994

White House Office of Faith Based and Neighborhood Partnerships of 2001

Consumer Financial Protection Bureau established 2011

Urban renewal policies left Auburn Avenue a shadow of its former self. With Title VII funds from HUD, Big Bethel AME constructed Bethel Towers, a high-rise residential tower for its low-income and elderly members.

Title VII also introduced funding for Community Development Corporations, creating a network of community financial institutions to advocate for and finance community development and housing.



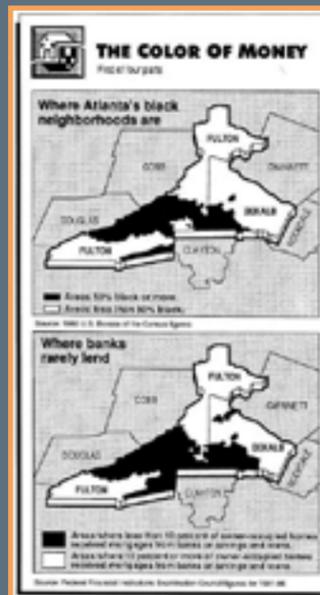
Bethel Towers

INTEGRATION, FLIGHT & HUD FUNDING

Figure 10. Excerpt: "The Color of Money," Atlanta Journal-Constitution, 1988

In the 1970s and 1980s, a conversation around redlining and racist lending practices dominated Atlanta's housing conversation. While churches continued to take action against the disparate treatment imposed in their communities, a 1988 series "The Color of Money," published by Bill Kovach in the AJC, helped to put a spotlight on these discriminatory practices

REDLINING & COMMUNITY REINVESTMENT ACT



Wheat Street Baptist Church on Wheat Street (later Auburn Ave.) is the first black church to sponsor a federal credit union. By 1999, the church held \$33M in real estate, including several buildings for housing. Wheat Street Towers, a senior living community, currently occupies one of these.

THE CIVIL RIGHTS CHURCHES



Wheat Street Baptist Auburn Ave.

From 1992's Georgia Dome to 1996's Olympic Games, Atlanta's global focus hastened the displacement of low-income Black neighbors. Black churches, especially in the downtown neighborhoods of Vine City and English Avenue, were some of the few advocates for residents during this era.

THE OLYMPIC ERA



Figure 11. VineCity Housing Ministry, Source: GSU Digital Collections



Figure 12. DOJ Settlement with Wells Fargo for illegal lending practices in Atlanta, 2012. Source: DOJ

Atlanta was among the nation's hardest hit cities during the Great Recession. Predatory mortgage lending plagued Black communities, and some mortgage lenders, including Wells Fargo, used Black churches to market deceptive subprime loans to congregants.

2008 MORTGAGE LENDING CRISIS



Figure 13. Mayor Dickens at the Higher Ground Empowerment Center, Vine City

TODAY

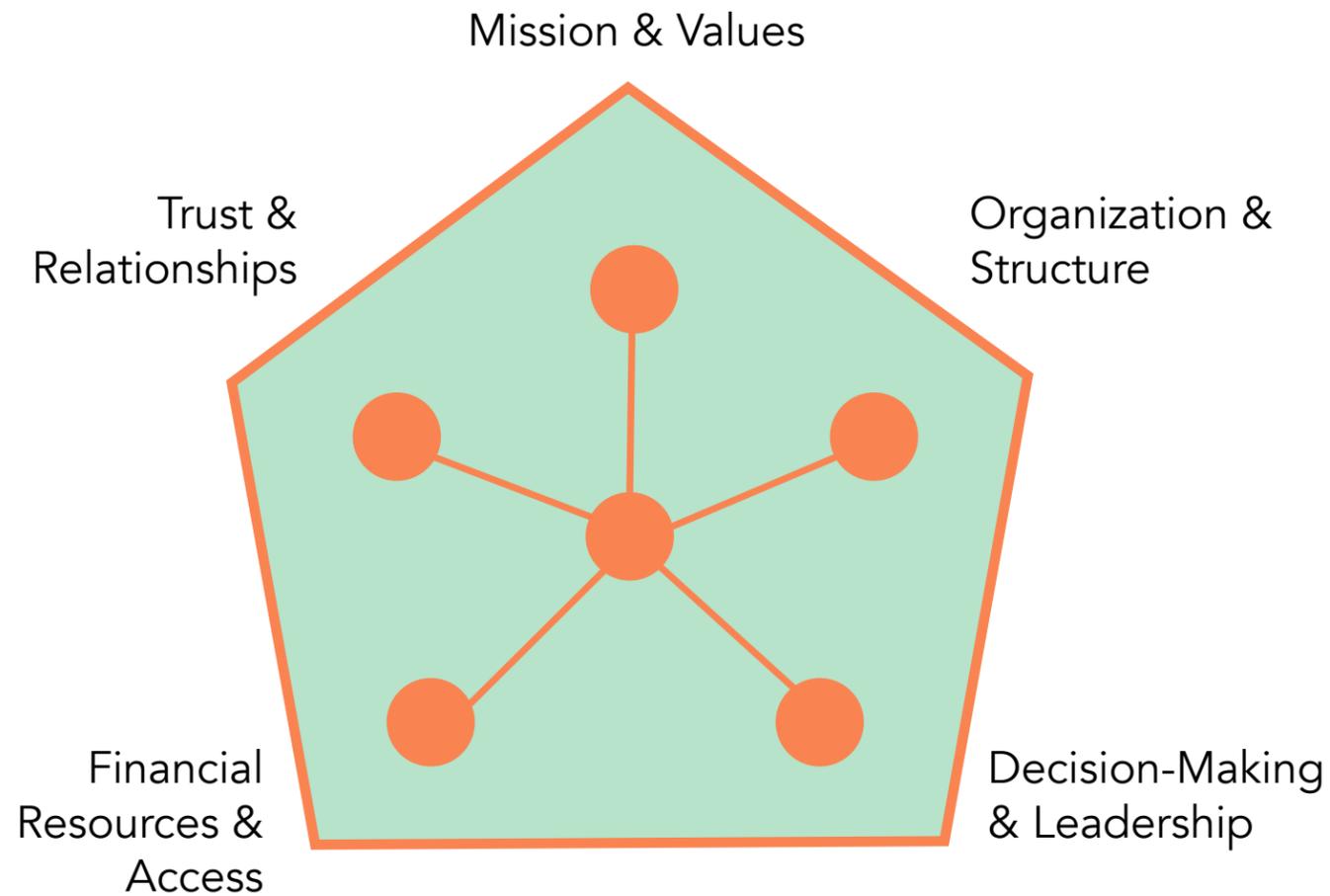
PIECING TOGETHER A LEGACY

BLACK CHURCHES AND FAITH BASED AFFORDABLE HOUSING IN ATLANTA, 1956 - PRESENT

Synthesizing Lessons Learned

In the next section, a model for planning, analyzing, and pursuing faith based affordable housing is presented.

5-Part Model for FBO Development



Houses of worship develop differently than other organizations. Understanding where these differences lie can help promote communication and strengthen partnerships. This model was developed through conversations with organizations around the country, reading case studies, and synthesizing existing literature on faith based development.

Each of these five areas of development has its own tools, expected challenges, and inspiring examples. FBOs will vary in their comfort level in each area. Still, understanding where an organization is on each of these five areas can help to move development forward while ensuring that the final product aligns with a congregation's mission, values, and capacities.

In the next section, each of these five areas will be expanded upon to provide pointers, tips, and areas of caution that we have gathered in our research.

Unpacking the 5-Part Model

1. Mission & Values

Description

FBOs come to development with different, sometimes incompatible, objectives. Values and mission can consist of broad development guidelines or project-specific intentions. Cosmopolitan A.M.E.'s development principles, for example, are broad enough to allow for flexibility but give the church a united narrative to present to partners and hold itself accountable. Building consensus and documenting values are important ways to track a project's mission.

Scripture is and remains an important source of values for many FBOs. From "biblical economics" in Exodus 22:15, which forbids earning a profit off of credit to the poor, to the Hebrew Jubilee, a 50-year event in which leased land reverted back to its original owner and unpaid debts were forgiven, to the forbidden practices of *Riba* (usury/interest), *Gharar* (speculation), and *Maysir* (gambling) in Islam, religious values in housing extend far beyond instructions to shelter the poor. Non-Abrahamic religions and culture similarly have long-established histories of community finance and ownership that allow resources to be distributed equitably and fairly among a community of members.

Challenges

FBOs are often called to build in places "where the market won't," as Bethel New Life's Mary Nelson describes it. In these situations, challenges are guaranteed to emerge. Many FBOs rely on prayer, collective consensus building, and faith in the face of risk to chart a path through these challenges. Vision and mission can and will change throughout the development process as a result. Developing with partners who respect and honor these processes and provide expertise with integrity can help surmount inevitable roadblocks and produce unexpected results.

Tools

Request for Proposals (RFP): a public announcement of your goals to allow prospective partners to apply to work with you.

Master Development Agreement (MDA): a formal agreement with development partners to define expectations, scope of work, and mission.

Internal expertise: legal counsel, planners, developers and accountants within an FBO can serve as informal "translators" of mission for external partners.

Visioning tools: committees, workshops, referenda, and development plans can help formulate and communicate mission and values.

Prayer

2. Organization & Structure

Description

How an FBO structures the ownership of a project determines how it will be built, run, and used long-term. Traditionally, the decision an FBO had to make was whether they would run a property outright or transfer operations to an independent entity. Changes in liability law, tax law, and insurance requirements since the 1980s have increasingly discouraged outright ownership; most FBOs now buffer their congregation's involvement with a project through a holding company. Holding companies can take the form of an LLC, an LP, a joint venture, a corporation, a 501(c)(3) non-profit such as a CDC, or a Trust. Greater Piney Grove Baptist, Wheat Street Baptist, and Chicago's Bethel Lutheran have founded non-profits to manage their properties, oversee development and operations, and act flexibly, all within arm's length of the church.

There are countless ways to structure a project, ranging from a standard joint venture partnership agreement to a tenant-owned project like The Cambria, an LA complex rehabilitated in the 1990s. Habitat for Humanity continues its model of direct oversight over development and transfer of property to individual homeowners. Many churches that want to retain ownership of their land, but transfer responsibility and control choose a 50-, 75- or 99-year ground lease model and collect monthly rental payments. Joint ventures allow for shared ownership and shared profits. In each case, the organizational structure determines the control, risk, responsibility, required investment, and revenue generation that an FBO takes on.

Challenges

A project's organizational structure is one of the most technical aspects of development. The chosen model must align with existing ownership structures, especially if the FBO is affiliated with a denomination with its own rules. Much of the land owned by individual Presbyterian churches in Atlanta, for example, is held in trust for the national or regional church and requires permission to encumber or share ownership. Once an organizational structure is decided on, clearly delineating responsibilities, rights, and rewards can be difficult. When Mercy Housing partnered with the Historic District Development Corporation on the Henderson Place project, for example, they built a matrix of the responsibilities that the respective parties could and would take on. This helped resolve conflict, avoid confusion, identify priorities, and guarantee accountability within the partnership. If a project's organization is not carefully crafted, it could result in a failed project, loss of land, financial hardships, or loss of tax-exempt status.

Tools

Joint Venture (JV): shared ownership between FBO or holding company and trusted developer. JVs share risk, investment, responsibilities, and revenue on a project.

Community Development Corporation (CDC): a federally recognized non-profit with a focus on housing, economic development, and community development. CDCs have long been a way for FBOs to invest and manage projects in their neighborhoods.

Community Land Trust (CLT): FBO land is held in trust and low-income residents can buy homes without paying for land. The trust's board consists of tenants, the FBO and community members.

Tenant Ownership: ownership of a building (with or without land) is transferred directly to tenants who operate as a cooperative or syndicate to run the property.

3. Decision-Making & Leadership

Description

Many FBOs that have pursued ambitious housing projects have had one thing in common: a driven leader. Even with a strong leader, establishing decision-making protocol is important for creating predictability and stability for a project. Decision-making processes may be internally defined, or they may follow from the legal and financial structures of the project. Because of the many stakeholders and existing customs, decision-making with FBOs often takes longer than with for-profit developers. LA Voice's Reverend John Oh notes that good decision-making protocol will often result in much stronger project results in the end, even if it takes longer.

For internal matters, many FBOs establish development committees and congregation-wide votes, especially in the earliest project stages. During pre-development and development, FBOs may begin to reduce their direct control. Some FBOs choose to defer decision-making to an independent organ like a CDC, some prefer direct oversight and ongoing decision-making, and some choose to sell their land and codify decisions in sale documents or covenants. Long-term operational decision-making can take a number of forms. Direct control by the FBO, the creation of tenant committees, joint venture agreements with an owner's representative and veto power, or a Community Land Trust model with reserved board positions for the FBO are all common options.

Shout Out

Shout out in Atlanta to the many churches with young women leaders of color. Pastor Smothers from Atlanta First United Methodist, Pastor Harris from The Greater Piney Grove Baptist, Cosmopolitan A.M.E.'s Reverend McDonald, and even College Park First United Methodist's lead developer, Cherie Ong, are among the Black women and women of color leading the city's most ambitious and innovative faith based developments in the region.

Tools

Internal Development Committee: parishioners and clergy responsible for most decisions. Big decisions are recommended to go to full-congregation vote

Ground Lease: the scope of control or decision-making between parties can be defined in the lease agreement.

Covenant Restriction: A restriction that "runs with the land" and can determine use of land after it has been sold. Usually valid for maximum 30 years.

Memorandum of Understanding (MOU): an agreement between development partners that does not involve financial contributions.

Tenant Committees: groups of tenant representatives that advocate for residents, make decisions, and communicate resident concerns.

JV Partnerships: FBO can retain voting power, veto power, or elect an owner's representative as a conduit on behalf of the congregation.

Land Trust Board Membership: Board representation can ensure FBO has say on decisions into the future while giving voice to residents and stakeholders.

4. Financial Resources & Access

Description

One of the first questions that comes up when discussing affordable housing is funding. Most often, FBOs are relegated to pursuing the same funding sources for affordable housing as non-profit and even for-profit developers: limited federal, state, and local subsidies, tax exemptions, or grants from foundations or supportive institutions. Most faith based affordable housing is financed through the Low-Income Housing Tax Credit (LIHTC). The 9% LIHTC program is highly competitive, offers deeper subsidy, requires projects to take on less debt. 9% projects range from 80-120 units. The 4% LIHTC program provides less equity subsidy, requires more debt, and produces projects from 150-300 units. Georgia law requires experience with LIHTC development to be eligible for awards, creating barriers for new players and requiring partnerships with existing developers. Other public funds include Community Development Block Grants (federal), a new Invest Atlanta grant for faith based organizations' predevelopment activities (local), and Housing Opportunity Bonds (local). Local non-profits such as the Atlanta Neighborhood Development Partnership (ANDP) and Enterprise offer small grants for affordable housing development. Community Development Financial Institutions (CDFIs) are also a resource to fund projects that serve distressed communities. Non-LIHTC sources usually only cover gap financing.

Black churches in Atlanta have always had to throw their weight around to provide financial opportunities for their communities. Churches founded the nation's first Black life insurance companies to provide collective financial security for members, and Black churches used their platform and their parishioners' deposits to pressure banks into changing their redlining practices in the 1970s and 80s. Nationally, FBOs secured financing by working with trusted local banks who had personal relationships with the congregation, and by fundraising and collecting zero-interest loans from parishioners, community members, and broader networks of FBOs.

Challenges

The Fair Housing Act restricts the ability to provide housing for parish members using federal funds. FBOs usually lack the financial acumen or development experience to win favorable debt terms, especially when building in areas designated as high risk. As religious attendance shrinks, so too do a parish's own funds and ability to co-finance housing. Bethel New Life - in their constant quest to identify community assets - put their own chapel up as collateral five times, sold promissory notes, and even solicited no-interest loans from well-meaning community members to finally fund their BethAnne project. In cases where limited public funding exists, FBOs have pressured local governments to create housing trust funds (Washington D.C.).

Tools

LIHTC: the largest public subsidy fund for affordable housing. FBOs must partner with experienced developers to access these competitive funds.

Other public subsidies: CDBG grants, HOBs and local trust funds can provide further funding. Non-federal sources often come with fewer strings attached.

Condominiumization: to provide housing to members, FBOs must divide single buildings into separate condos and only use federal funds for compliant portions.

Tax exemption: FBO housing activities are not automatically eligible for tax exempt status. Single family housing, senior housing, and vague "public charity" activities are tax exempt.

5. Relationships & Trust

Description

One of the most important and most undersung ingredients for successful development is social capital. Without relationships and trust, no project can move forward. FBOs foster relationships with their parishioners, with their surroundings and communities, within networks of other FBOs, with political leaders, and with institutions and other professionals. FBOs that build successful projects often serve as guidance and teachers for others. Trust among partners can help stay afloat when challenges arise and can foster channels of communication and openness that improve project outcomes.

Making Housing and Community Happen is a longstanding interdenominational coalition of faith leaders in Pasadena, CA. Their moral standing and existing relationships locally and statewide have turned them into an influential moral compass on housing matters in the area. Not only does the coalition assist member congregations in developing housing, they have successfully lobbied for rule changes to improve structural capacity. A zoning overlay for FBOs was passed thanks to their efforts, and the coalition continues to push the conversation on rent control, tenant protections, and funding further. LA Voice, a similar organization in the LA area, provides pro bono consulting services to FBOs seeking to build housing and uses its network to champion fair housing, racial justice, citizenship services, and voting rights. From Jubilee Housing in D.C. to the Vine City Housing Ministry in Atlanta, coalitions of FBOs have been able to self-advocate and realize new political possibilities for housing justice by banding together.

Challenges

Despite the power in relationships, the strains of development can also cause relationships to fray. Conflicts arise between congregational factions, between development partners, and between a project and the community. Sometimes walking away from a partner, a parish, or a project is the only way forward. Other FBOs have worried that their ministry would brand them as paternalistic in their communities. Finally, trust may be taken advantage of, as was the case before the 2008 mortgage lending crisis, where national banks targeted trusted Black faith leaders in their community to advertise subprime mortgages.

Tools

Coalition building: joining together with other FBOs amplifies mission, provides political power, and helps share lessons quickly.

Community outreach: early, frequent, personable outreach can mitigate problems before they arise and provide unexpected avenues for growth.

Internal listening exercises: a congregation can provide its own source of strength and support, so ensuring internal buy-in is crucial for later solidarity.

Relationships with non-FBOs: FBOs often partner with universities, mission-aligned non-profits, and even sympathetic private partners to gather expertise, think innovatively, and gain access to scarce materials and labor.

A Nation of FBAH

Examples of faith based affordable housing initiatives from around the country

“Where two or three are gathered”

LA Voice - an interdenominational coalition

LA Voice is a grant-funded non-profit coalition of faith leaders that help houses of worship communicate with developers to build affordable housing. Recognizing that most congregations lack resources, budget, volunteers, and know-how, LA Voice offers consulting services and a network of knowledge to help FBOs make the best decision for their land.

LA Voice helps congregations develop a vision and come to a shared consensus across the parish. LA Voice promotes space and dialogue to FBOs where developers provide little room for discussion. They help fix the terms, conditions, and goals into a competitive RFP process to increase a congregations' leverage in negotiations with applicants. The group discourages churches from developing housing directly, citing the risk, learning curve, and necessary resources as deterrents.

Pastor John Oh notes how churches are usually pressured to undervalue their land in negotiations, leaving them open to being taken advantage of. LA Voice encourages fairly appraised ground leases so that FBOs do not co-subsidize projects through land. Sometimes, FBOs will act as equity partners, enjoying project upside. This helps land rich, cash poor FBOs advance their mission fairly.

LA Voice also uses the power of their coalition to push for housing justice issues in the city, county, and state. They are currently lobbying for a faith based zoning overlay that would allow up to 32 units/acre on all FBO land.

Five loaves and two fish

Bethel Lutheran's Asset Based Community Development

Bethel New Life, a CDC ministry arm of Bethel Lutheran Church in Chicago's South Austin neighborhood, completed the 9.2 acre BethAnne Residences in the early 2000s, an adaptive reuse of an abandoned hospital. In total, Bethel New Life has constructed over 350 units of affordable multifamily, 270 units of assisted living, 84 units of supportive housing, a health clinic, performing arts center, small business center, administrative offices for the CDC, and educational facilities, all in a West Side community that was historically denied capital and investment.

How did Bethel do it? The church advocates for what they call "Asset Based Community Development," an approach that doesn't look at what a community needs, but what it already has. The BethAnne project was a result of perseverance and repeated creative funding solutions. In addition to federal HUD and HHS grants, the group collateralized its church building to obtain loans, worked out self-finance purchases with former owners, sought Congressional appropriations, sold air rights to an independent entity for LIHTC development, established sweat equity corporations to transfer ownership to low-cash individuals, and solicited 0-interest loans from mission-aligned churches and individuals. Bethel recommends diversifying financial sources, which, although difficult to obtain and manage, allows flexibility, resiliency, and retained control to actually achieve ministry goals. Bethel's close, trusting relationship with a local bank made funding easier over time.



Figure 14. Bethel New Life's BethAnne development. Source: Google Maps

"I am doing a great work, and I will not come down"

Brooklyn Nehemiah Church

In the late 1970s a group of clergymen and laypersons from Brownsville and East New York came together to discuss ways their churches and congregations could work collectively to address concerns in their neighborhoods. At that time, the neighborhood's residents were primarily African American and Latino. The neighborhood of Brownsville was deeply deprived of resources and was referred to as "Bombville," due to the number of empty lots and burned-out buildings. This group of clergymen and laypersons would later form the East Brooklyn Churches (EBC) and collectively build over 4,500 affordable homes under the Nehemiah housing plan.

The Nehemiah housing plan's philosophy was to build political power, focusing on developing "citizenship" rather than providing services. Churches provided start up funds and places to meet, and housing was designed collaboratively with neighbors, architects, and faith leaders. When the first homes opened, sales prices were 40% less than the surrounding neighborhood. Nehemiah has continued to build ever since, withstanding the Great Recession and continuously serving as a protector against speculation and gentrification in the neighborhood. The structure of the Nehemiah housing plan was executed so well that its framework has been used to rebuild other deteriorating neighborhoods¹³.

Time, Talent, and Treasure

Focused Community Strategies' GlenCastle Residences

Focused Community Strategies is a faith based community development ministry centered in South Atlanta. FCS's approach to community development features affordable housing (both rental and homeownership), economic development, and building community spaces for old and new residents. FCS received national attention for its early-2000s repurpose of a former prison, the Stockade. FCS relied on pro bono and at-cost services from design and development firms and completed the entire project with no debt, allowing for deep affordability to future residents. FCS recommends designating a "guardian of the vision" responsible for advocating for a project's values, similar to an owner's representative. They ensured that each new decision was on-mission and that the building process aligned with values of compassionate and at-cost services. When City of Atlanta offered a \$3-million grant lifeline to GlenCastle project to build transitional housing for the unhoused, the organization eventually declined to preserve its goal of building family housing. The group eventually sourced the missing funds elsewhere¹².

Endnotes - Part One

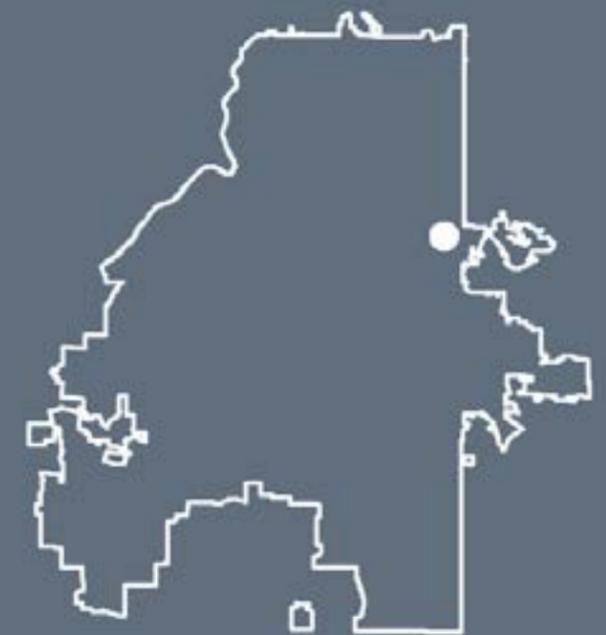
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Our Partners



Congregation Shearith Israel

The new campus design for Congregation Shearith Israel sought to solve for the site's current island effects and inefficient land uses. The proposal creates a sense of connectedness and dedicates more space for intergenerational encounter. With the new plan, we were able to provide new worship spaces, filling an important gap in the current site. Senior housing on-site allows for elder congregants to gracefully age in place. A newly proposed multipurpose building includes a medium-sized meeting space and relocates administrative services. The plaza space creates a greater level of connection between community members. With Campus Shearith Israel, the congregation is able to meet its current needs and grow into the future.





Congregation Shearith Israel (CSI) is an egalitarian, conservative synagogue located in Atlanta's Morningside neighborhood. Relationships are at the center of the synagogue's ministry, as is education of both children and adults in Jewish values, history, and language. CSI was founded in 1904 by Eastern European immigrants. The synagogue was named Shearith Israel meaning "Remnant of Israel" to acknowledge their status as pioneers. After WWII, the congregation followed the migration of the Jewish population northward, eventually settling at its current location on University Drive in 1949. Not only was CSI the first synagogue in DeKalb County, its current site formerly housed a school run by the Ku Klux Klan - a drastic transition!

CSI is governed by an appointed president and an executive board who together decide on congregational matters. The rabbis of the synagogue, who work on five-year contracts, wield influence but have no formal discretionary power. Although the congregation's membership has declined in recent years, members feel closely involved in the synagogue's direction and future..



Existing Uses



Existing Ministry

The Ben H. Zimmerman Religious School Building (2), designed by A. Ten Eyck Brown in 1917, is the oldest building on the campus. Its current tenant is a daycare program. Previously, it also housed a Hebrew school. Just outside of the building are the daycare's playgrounds.

The Sanctuary Building (1) dates back to 1957 and houses CSI's worship activities. Two wings, the Zimmerman Hall extension (7) and the administrative wing (4) were added in the 1980s and house meetings, offices, and a library.

Rebecca's Tent is a seasonal women's homeless shelter (November to March) located in the lower level of the Sanctuary (1). CSI created the program in 1983 as one of the first women's shelters in Atlanta and the nation's first synagogue-based shelter.

The parsonage (3), originally constructed as the rabbi's residence, is a single-story cottage at the site's NE corner. In recent years, rabbis have opted to live off-site, so CSI leases the parsonage as a single-family home and source of revenue for the congregation.

Desired Future Uses



Appropriate worship spaces: CSI's buildings do not meet its current worship needs. CSI desires a mid-sized worship space for smaller attendance and an outdoor space to host larger events.



Expansion of uses: CSI has commissioned a master planning committee and the firm Lord Aeck Sargeant to oversee the first major campus change in 40 years.



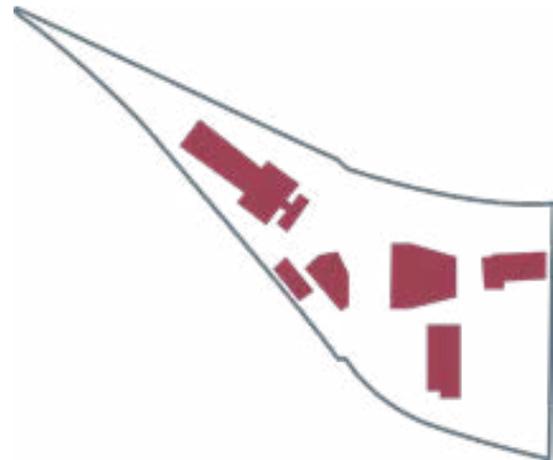
Stable revenue: Decreased membership has increased reliance on other revenue to fund synagogue functions. Once the daycare's contract expires in five years, new income sources will be needed.



Expand housing: Morningside is becoming increasingly unaffordable to synagogue members. CSI hopes to provide affordable housing to stabilize membership.

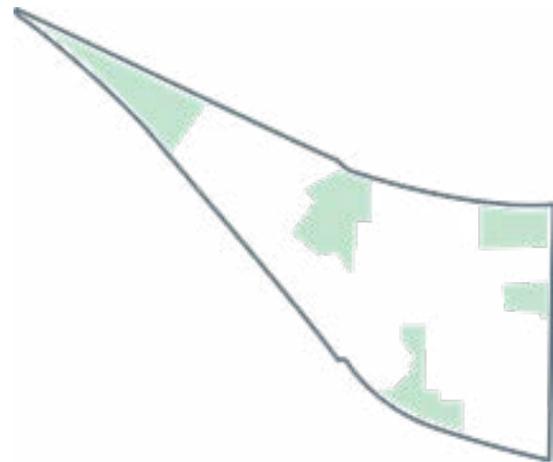
Spatial Analysis - Issues

The existing master planning conducted by the synagogue with consultants, recurring conversations with the congregation and key stakeholders, a site visit by our group and a detailed spatial analysis have indicated three principle challenges with the current orientation of key site uses.



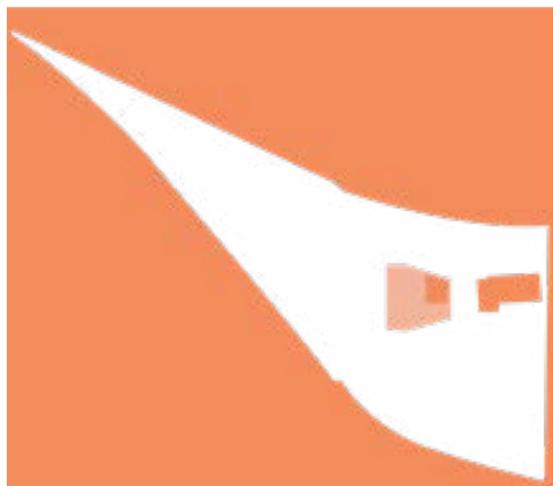
Island Effects

Although Congregation Shearith Israel houses numerous buildings and functions, their placement lacks cohesion. The daycare facility is displaced from outdoor play areas and separate from the rest of the sanctuary space. Uses within the sanctuary are scattered around the building, placed where there is space. The lack of cohesion results in islands of activity, counter to the synagogue's aim of creating sense-making space on campus.



Lost Spaces

The odd placement of existing buildings leaves large areas that, because of their shape, placement, and size, lack identity or purpose. At the NW tail of the site, a narrow green area currently serves as an outdoor worship space but is uncomfortably exposed to the intersection of Spring Valley and University. The "Garden" at the center of the site is overwhelmed by a large roundabout, depriving it of function and causing it to separate, rather than join other uses.



Uncertainty of Growth

Congregation Shearith Israel is undergoing a transformation that will play out over the next decade. Current spaces make growth difficult; spaces like Rebecca's Tent or the parsonage are limited in size and therefore function, while the sanctuary is too large to accommodate an organic transformation. The surrounding neighborhood, itself seeing rapid rises in income and NIMBY sentiments, and existing restrictive zoning present another challenge to proposed future developments.

Proposal: Campus Shearith Israel - Vision



24 units of affordable senior housing ranging from 6-800 sqft. with communal garden space and kitchen.

Partial demolition of an existing wing opens up the courtyard for outdoor worship and holiday festivities.

A new multi-use building frames a large central plaza, encouraging encounters and housing myriad synagogue functions.

A second story addition to the existing administrative wing expands and unifies education services.

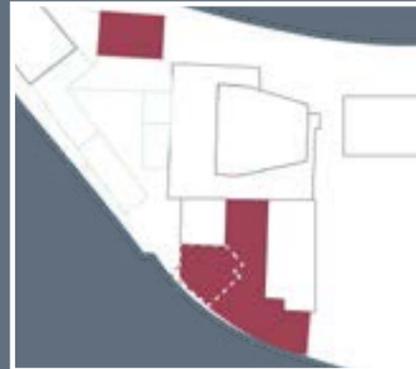
Proposal: Campus Shearith Israel - Uses

We envision a campus that encourages connectedness, harmonizes uses, and creates common spaces for worship. Changes to auxillary buildings and new construction allow existing uses to be reimaged, new uses to be added, and spaces for encounter and interaction to be fostered.

Worship and Administration

A new two-story multipurpose building at the location of the garden adds a mid-sized gathering space and relocates existing office, administrative, and library functions upstairs. The gathering space can serve as a worship space, meeting area, or youth lounge.

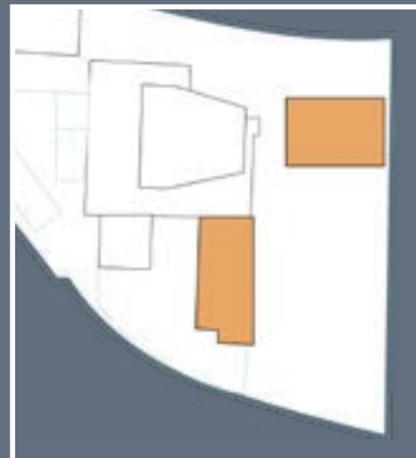
Downsizing Zimmerman Hall allows the former courtyard to be restored as an outdoor worship space, sheltered on three sides by the sanctuary. The courtyard's proximity to parking and daycare facilities eases participation by older patrons and parents.



Ministry

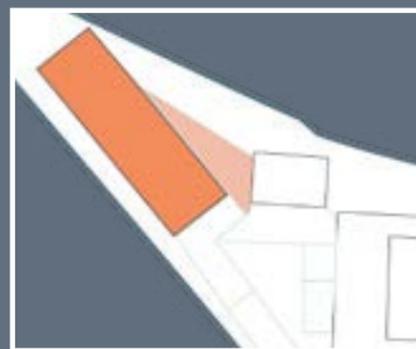
The former administrative wing will be remodeled and given an extra story to accommodate existing daycare uses and expand educational services. Staggered timing between daycare functions (morning) and other educational uses (evening, weekend) increases efficiency of the space. The modified western annex provides additional space for events.

Rebecca's Tent will be relocated to the parsonage. The current building will be rebuilt as a two-story home to provide more individual privacy and space to the women and allow expanded capacity. The exterior of the building will resemble neighboring homes to allow discretion to patrons.



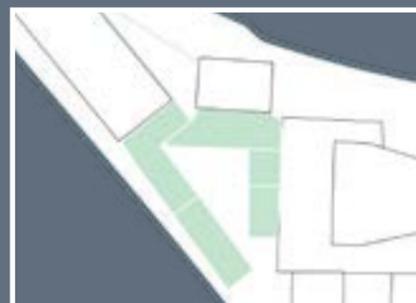
Housing

A new 24-unit affordable senior living facility will be constructed where the Education Building currently stands, taking careful consideration of historically meaningful architectural elements of the existing building. The senior facility will include common areas such as a shared kitchen and an outdoor garden facing away from the synagogue to foster semi-private community among residents. Affordability ensures that synagogue members can age close to their community at a reasonable price range.



Spaces of Encounter

In place of the current, use-isolating garden, a new plaza will serve as a connective tissue for the campus's other functions. Use-defined outdoor spaces will exist in proximity to one another, allowing more frequent visual interaction and encounter between children, parents, congregants, staff, youth, and elder residents. Intergenerational connectivity allows for learning and purpose, in line with the CSI's mission to "create more meaningful living through Jewish life."



Looking Forward - Expected Hurdles

Engaging Neighbors



Any future increase in residential density will require neighborhood approval. With that comes possible pushback. Early, frequent, and personal connections with neighbors is crucial to form supportive coalitions and navigate sensitive topics.

Funding Sources



There are no reliable sources of funding for affordable housing <100 units, where LIHTC kicks in. Affordable housing is a key political issue in Atlanta. There is an opportunity to begin advocating for new local subsidies to provide missing middle low income housing.

Zoning Restrictions



Current R-4 zoning disallows more than two units on CSI's site - drastically less than proposed. The current zoning rewrite provides the public an opportunity to reimagine R-4, especially for land owned by faith based organizations fulfilling their community service missions.

Conclusion

An ambitious campus redesign positions CSI to grow for future generations. The opportunity for intergenerational learning, supportive age in place infrastructure and ongoing, lifelong education align with Jewish values and the goals of a strong congregation. Despite challenges ahead, CSI can couple its long time frame, political will, friendly outreach, and tenacity to make Campus Shearith Israel come to fruition.



Central Presbyterian Church

Over a century of service

Central Presbyterian Church (CPC), founded in 1858, is a congregation located in Downtown Atlanta, directly across the street from the Georgia State Capitol Building. Its iconic Gothic Revival sanctuary was built in 1885 by Edmund J. Lind and has been largely unchanged since, still housing services to this day. White flight from Downtown Atlanta began as early as the late 1920s, when streetcar suburbs and federally backed mortgages offered white families access to inexpensive, convenient suburban life. As membership declined, CPC leadership elected not to move with its congregants, earning it the nickname "The Church that Stayed."

The church has over a century of history of service and outreach, starting with founding the Atlanta United Mission in 1907, which lodged and fed transient men. In 1922, the Church established the Baby Clinic, a place



Figure 16. Aerial image of Central Presbyterian Church ca. 1900. Source: Central Presbyterian Church

that provided free medical services to children of families that needed it. Central Presbyterian sponsored a spinoff church in the Buckhead area, Trinity Presbyterian, whose elementary school was later the first private school in Georgia to integrate. In the 1960s, the Church provided food and lodging for civil rights workers and those attending Dr. Martin Luther King Jr.'s funeral. In the early 1970s, the church encouraged families to support the nationally controversial 1973 Compromise in Atlanta - a policy that sought to cap a decades-long struggle against school segregation. Throughout its history, CPC leadership and its congregants have advocated for moderate policy positions and Downtown neighborhood prosperity. Today, the church has continued its service work by partnering with the Catholic Shrine of the Immaculate Conception, located on the same block, to run the Bashor Men's Homeless Shelter, a cold-night shelter for unhoused men that runs from November to March. CPC still operates the Central Outreach and Advocacy Center (OAC). Started in 1980 before becoming an independent nonprofit in 1997, the OAC provides job readiness services, including anything from interview coaching to assistance in procuring identification cards, and advocacy and lobbying work to push for legislation to prevent homelessness.

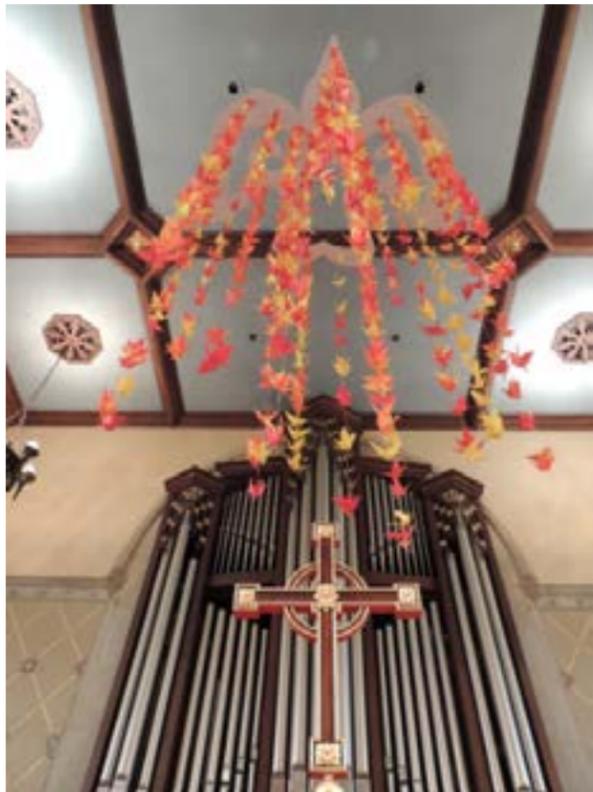


Figure 15. Inside the sanctuary of Central Presbyterian, with decorations and a pipe organ. Source: Central Presbyterian Church

Finding Equity in Unexpected Places

Transfer of Development Rights

Atlanta City Council designated CPC's main sanctuary building as an historical landmark on October 23, 1989 because of its architectural and historic significance. This designation prohibits demolishing, changing the exterior, or erecting a new structure or any additions to the building pursuant to Atlanta City Code, §16-20.007. Because historic designations restrict the free use of property, a jurisdiction that levies this tool may risk a takings suit from property owners per the Fifth Amendment of the US Constitution¹⁵. Many jurisdictions allow air rights to be transferred from an historic property to another where development is not restricted to avoid this risk. Although the 1978 landmark case Penn Central v. New York City recognized this practice, current jurisprudence is unclear whether TDRs serve as defense against a takings claim. In Atlanta, historically designated buildings qualify to receive transferable development rights (TDRs; Atlanta City Code §16-28.023). TDRs allow owners of historically designated sites the ability to recoup value by severing their unusable development rights and selling them to an eligible receiving property.

Determining TDRs

Once CPC discovered that it had claim to some amount of TDRs, it used the formula in Figure 17 to calculate the church's full TDR allowance.

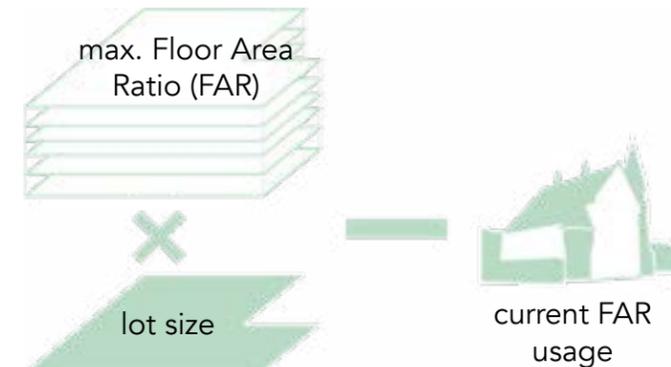


Figure 17. Equation to calculate available TDRs. $TDR = (max. FAR \times lot\ size) - used\ FAR$

Each zoning designation has its own maximum floor area ratio (FAR). CPC is in SPI zone 1: Downtown Subarea 1: Downtown Core, which allows a maximum 25 stories of residential space and 10 stories of commercial space. In 2020, CPC elected to preemptively sever 700,000 sqft. of residential TDRs and 300,000 sqft. of non-residential TDRs.

Transferring TDRs

City of Atlanta zoning code prescribes processes for severing, banking, transferring, and using TDRs. Severing and banking TDRs can be done by any so-called "sending site" and can be either immediately transferred or banked for future use. Because it pertains to the zoning ordinance, any change in TDR ownership is a legislative rather than a judicial function and requires approval by Council. In Atlanta, to send or receive TDRs, a special use permit is required.

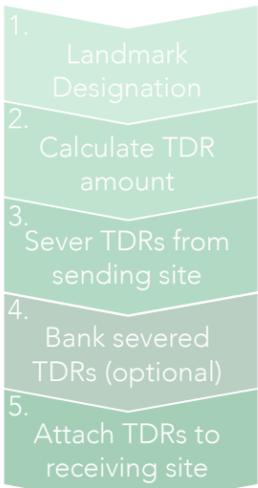


Figure 18. TDR transfer process. Steps 3-5 may be consolidated in event of simultaneous transfer

The Challenge

Since CPC severed its TDRs, it has been unable to find a buyer. This challenge is not unique to CPC. Scholarship on TDRs in the Atlanta area reveal three major shortcomings to the program:

Tricky TDRs

1. There is no natural or required demand in TDR market,
2. Familiar alternatives to TDR market exist (rezoning),
3. Transaction costs (SUP, Zoning Review, legislation, fees) to send and receive TDRs are high.

Locating potential recipients

The largest ever TDR transfer to date in the City of Atlanta was 286,884 to the Atlanta BeltLine in 2011. CPC's 1-million square feet of rights far eclipse that amount. The church would like to deploy its TDRs for affordable housing development, but the disadvantages of the TDR program has challenged the church. We conducted the following four-part spatial analysis to help find a partner.

1. Getting the zoning right

TDR receiving sites must be zoned for multifamily residential or mixed use with 50%+ residential. Potential receiving sites are first identified as those with a low-density zoning classification. These are sites whose development may be restricted by current zoning rules.

Results: 169,163 parcels

Zoning: C-1, I-1, MRC-1, RG 1-3, MR 1-3



2. Getting the land use right

The future land use of a site is outlined in the Atlanta Comprehensive Development Plan and determines the uses appropriate for the future of that site. Sites with low density zoning but high density land use are ideal target markets for TDR receiving sites. These sites have high density futures but are restricted by current zoning.

Results: 8,126 parcels

Future Land Use: VHDR; HDR; MDR; MDMU; HDMU



3. Getting the appetite right

CPC may donate TDRs to affordable housing developments. Few affordable housing projects are larger than 200-300 units or 300,000 sqft. We define a site's appetite for TDRs as calculated by subtracting the total development area (FAR x lot size) from 300,000. Sites larger than this presumably already have enough developable area and would not need any TDRs.

Results: 4,445 parcels

Lot size: under 300,000 sqft.



4. Getting the costs right

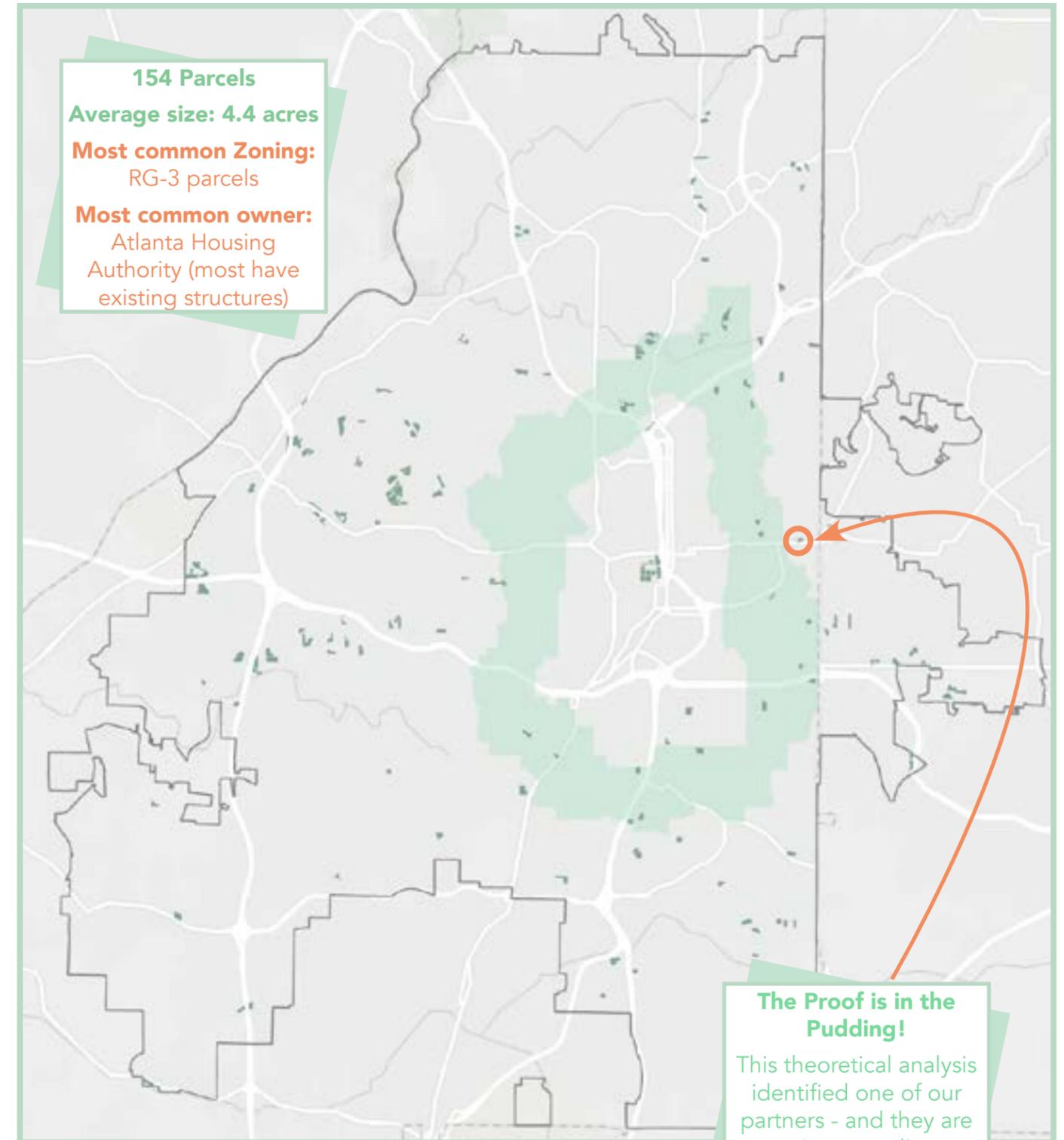
One way to reduce rental prices for tenants is to avoid expensive building materials like light gauge steel and concrete in construction. Current Atlanta building code allows wood framing up to five stories. Allowing for surface parking needs, we estimate that receiving sites under 100,000 sqft. would not be able to maximize its FAR without building upward.

Results: 154 parcels

Lot size: over 100,000 sqft.



Results: possible TDR landing sites



154 Parcels
Average size: 4.4 acres
Most common Zoning:
RG-3 parcels
Most common owner:
Atlanta Housing Authority (most have existing structures)

The Proof is in the Pudding!
This theoretical analysis identified one of our partners - and they are interested!
Meet: Druid Hills Presbyterian Church

Pitching a sale

Of the 282 sites that were flagged as potential TDR recipients, many are already developed or slated for development, many are underused or abandoned, and many appear unencumbered. Further due diligence would be required across the findings to determine the ideal candidate. As an exercise, we've selected one site to show how TDRs could affect future affordable housing development.

350 Chappell Rd NW

Grove Park, ATL

Lot size: 4.4 acres, ~200ft x 900ft
 Current zoning: RG-3
 Future land use: High-Dens. Res.
 Developable area: 193K sqft.
 TDR appetite: 107K sq ft.
 Owner: Mac Holdings of Fulton Cty



The site is located off of Joseph E. Boone Blvd. in Grove Park, .5 miles west of the future west side BeltLine trail. The Boone corridor is designated as a Growth Corridor in the Atlanta City Design, and the site is surrounded by medium-density multifamily affordable housing. Most of the site is free of trees and mostly at-grade. FAR with current zoning is .696; a transfer of TDRs would increase actual FAR to 1.5.



Site Comparisons - Atlanta affordable housing projects like 350 Chappell

Columbia Tower and Senior Housing at MLK Village
 Capital Gateway, 2007



95 unit affordable housing tower with 40% transitional housing in partnership with United Way. Land owned by Ezekiel Baptist. 122 units of affordable senior housing in 4-story complex. Built by Columbia Residential using LIHTC, FHA funds.

Gates Park Crossing
 Hartland Terrace, 2007



153 units of affordable housing in 8, 2-story medium density buildings. Parking along exterior of complex with large, open, connected green spaces between. Neighborhood proximate to Hamilton E. Holmes MARTA Station.

Mechanicsville Phase III
 Mechanicsville, 2006



164 units of affordable housing in 3, 4-story buildings. Funded by LIHTC with additional Project Based Rental Assistance (PBRA) subsidy. Property managed by Atlanta Housing. Project located .5 miles east of West End MARTA Station.

TDRs: a practical resource for FBOs?

Assumptions and Limitations of the Analysis

Our TDR receiving sites analysis may not result in a comprehensive list of all potential recipients.

On the one hand, our analysis may come up short. We use the density differentials between zoning and land use designations as a stand-in for suitability of TDR receipt. This approach excludes medium density zoning designations, such as C-2 and I-2, and medium- and low-density land use, like low-density commercial and medium-density residential, all of which have been recipients of TDRs in the past. Our parcel-size assumptions are based on the principle that the high transaction costs associated with transferring TDRs incentivizes small numbers of high-quantity transactions. If TDRs were easier to transfer, smaller sites would suddenly become more attractive targets.

On the other hand, our analysis may come up with too many potential receiving sites. We only took into consideration zoning, land use, and size constraints, but did not consider existing uses, development feasibility or proximate nuisances (highways, airport) in our assessment.

Faith Based TDRs

Some faith based organizations have expressed interest in TDRs, as many of these already have or may one day seek landmark building status. The following FBOs may have claim to TDRs.

1. First Congregational United Church of Christ
2. Peachtree Christian Disciples of Christ
3. St. Mark United Methodist Church
4. The Temple, Hebrew Benevolent Congregation
5. Basilica of the Sacred Heart of Jesus
6. Rock Springs Church
7. St. Mark A.M.E. Church (designation pending)

Without a change in local TDR administration or legislation, it is unlikely that any of these organizations will have an easier time than CPC in identifying a buyer for their assets, rendering them valueless. TDR law is a matter of zoning. Currently, Atlanta is undergoing ATL Zoning 2.0, a multi-year rewrite of the City's Zoning Ordinance that is projected to conclude in 2024. As of December 2022, public outreach and workshops have begun. Below are a list of zoning recommendations that we believe would improve the usefulness of TDRs for FBOs.

Recommendations for creating a valuable asset out of TDRs

Supply-side changes

Make it easier to obtain TDRs by expanding eligibility criteria or allowing voluntary opt-in for sending sites to increase importance of TDRs.

Demand-side changes

Designate specific TDR receiving areas (e.g. growth corridors) and clearly define TDR-density bonuses that would attract demand.

Close alternate approaches (rezoning) by allowing maximum densities to be achieved exclusively via TDR (see SPI-9 TDR rules).

Remove outdated SPI-16 and SPI-9 closed TDR systems (remnant of past TDR rules).

Transaction cost changes

Regulate TDR receiving zones through zoning legislation rather than through variance board.

Host TDR marketplace on City website (example: City of Milton).

Designate pre-approved sending and receiving areas so that sites do not have to apply to be sending or receiving sites.

Legal changes

Lobby for state level changes - especially TDR requirements and affordability language for receiving sites.

Form coalition with preservationists for advocacy.

Druid Hills Presbyterian Church

Centrally located and community-connected, Druid Hills Presbyterian Church is looking for ways to utilize their campus to fulfill the church's higher mission without displacing their many current uses and tenants. Interim Rev. Betsy describes affordable housing's links to the church's ministry and theological ideology as the need to "make room for everyone at the table." With a new mixed use highrise, Druid Hills has the opportunity to host affordable residential units as well as several commercial units, providing stability in the tumultuous development market for long-term, local community businesses along the culturally important Ponce corridor.

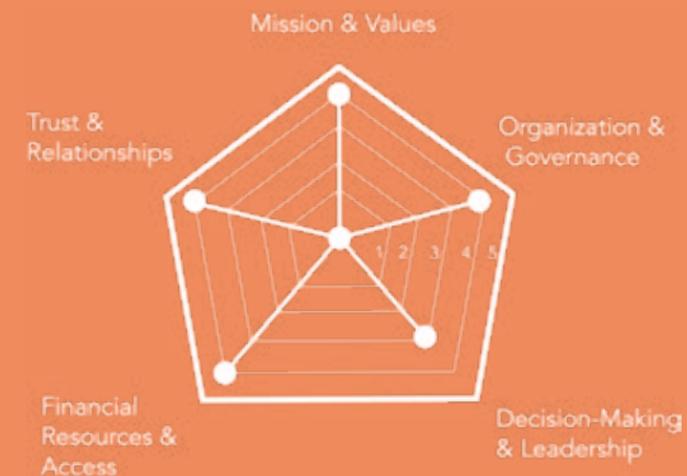




Figure 19. Druid Hills Presbyterian Church

Druid Hills Presbyterian Church (DHPC) was chartered in 1883 in Downtown Atlanta. As the area transitioned into a commercial hub, the church sought a new campus in a more residential area, finally landing at its current site on Ponce De Leon Ave. in 1910. From 1940 to 1960, the church grew immensely, peaking at 2,000 members. At this time, DHPC seeded several other churches and developed its property into the cluster of buildings we see today, including the sanctuary. Nowadays, with typical Sunday attendance around 200, Druid Hills identifies as a small and progressive church. In line with its support for the LGBTQ+ community, the church has participated in pride events and is proud to be involved in racial advocacy. The church runs a night shelter with roots dating back to the 1980s, offering a warm, safe haven for those experiencing homelessness on winter nights. The church's commitment to service has led current leadership to consider the development of affordable housing on their campus.



Location Features

Druid Hills Prebyterian Church is nestled between the Joan P Garner Library and Briarcliff Summit apartments, across from a Publix and the landmarks: Majestic Diner and Plaza Theater. The Ponce corridor hosts several MARTA stops and transit access. A HAWK signal in front of the church allows for easy pedestrian crossings.

Busy Sundays at the sanctuary are balanced by weddings, concerts, and community forums throughout the week. The church leases its buildings to many nonprofits, including a daycare (3) with playgrounds (4), the expanding Intown Food Pantry (6), and Mercy Community Church (4), a grassroots, ecumenical Church dedicated to serving and worshiping with the unhoused. The Presbytery of Greater Atlanta's headquarters and administration building (2) is located on site. The Presbytery's former library and office space is currently underused.

The site is surrounded by dense housing and the Ponce corridor is identified as an important growth area for the eastern parts of the city.

...and Challenges

Recently, the Ponce corridor has made headlines as the site for many large-scale, high-end mixed use developments, mostly centered around the nearby BeltLine intersection. With these announcements come notice that many beloved commercial landmarks have been closed. Currently, no policy tools exist to prevent commercial gentrification, causing alarm for the culturally significant strip.

The neighborhood surrounding the church - the wealthy Virginia-Highland - has shown a historic lack of inclusivity and diversity that shapes its current demographics. Despite its proximity to many amenities and services, the area has not seen any tax credit-funded low-income development in over 20 years. The site is not eligible for TAD, NMTC or Opportunity Zone funding.

The site's many uses make its parking needs acute, especially if a density of functions is to be added. The church does not want to sacrifice existing parking for Sunday services.

Existing and New Site Designs



A 7- to 9-story mixed use building at the front of campus serves as the Lighthouse on Ponce, providing much needed affordable housing, stable commercial and office space, parking, community spaces, and food pantry expansion to the campus. The campus's educational services are given more convenient facilities, and the church's worship and other ministry functions remain unchanged. The new site presents a lively, attractive facade to the Ponce corridor where a surface-level parking lot currently stands.

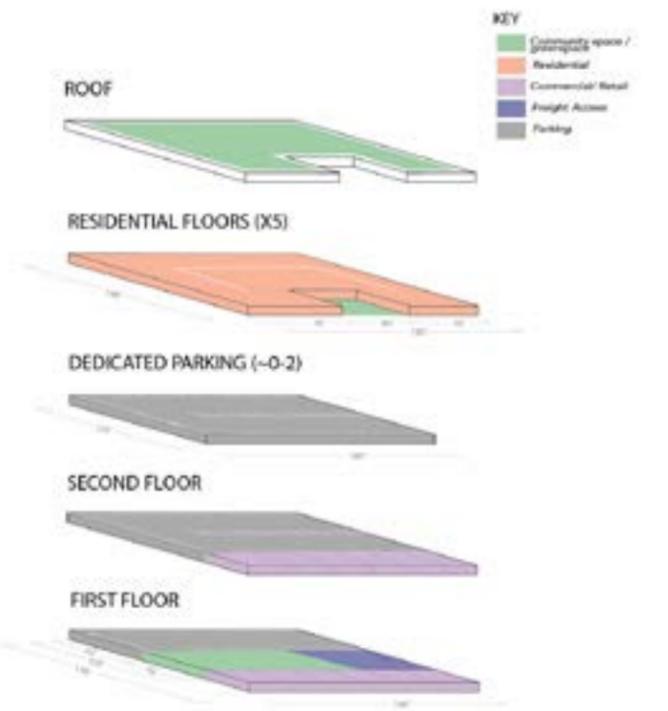


The Lighthouse on Ponce



The Lighthouse on Ponce building hosts just over 100 affordable units through five residential floors. Units range from studios to 3-bedrooms with an average size of 800 sqft. on repeated floor plans. Units contain several windows and a large balcony looking over the lively Ponce. Balconies add valuable outdoor space for residents, provide an opportunity for self-expression and give residents the ability to grow plants, care for pets, enjoy the Atlanta night air, or greet neighbors passing by.

The first floor of parking raises at a sharper angle, bringing the deck up to 15' height over the 180' width of the building. The food pantry and freight access are tucked under this deck at the west end of the building, and commercial hallway access runs along the back of the street-facing commercial spaces. The inefficient parking allocation on the ground floor allows for this mix of uses and ministry.



Using the whole site: spaces for ministry

Child Development Center

Putting all facility resources close together has convenience and safety benefits. With the main playground closer to the facilities, children no longer need to cross the road to go play. A second park nearby allows for a spillover outdoor area. The site design pays careful attention to the needs of parents dropping off and picking up children along the busy Ponce de Leon Ave. and features a roundabout that allows a smooth flow of morning and afternoon traffic.

Parking

This design moves ~35 parking spots from the church's front parking lot into a multipurpose parking garage on the ground floors behind the new mixed use building. The garage offers 30 parking spaces on the first floor and ~60 more spaces for each additional floor to meet the needs of the residential and commercial units. We recommend one floor of dedicated parking above the ground floor, although the design can be expanded to up to three. The new campus road also includes parking spots on either side, and all the original parking behind the church remains unchanged. Total parking is between 170 and 300 spaces.

Ministry

To account for its popularity and needs to expand, the food pantry is relocated to the first floor of the new mixed use building, directly underneath the parking garage. The allocated space for the food pantry is 5,000 sqft. with the opportunity to expand into other commercial or office space. The building also allows freight access on the ground floor, and the day care drop-off road doubles as a freight turn-around, allowing streamlined deliveries.

Commercial and Community Space

The proposed mixed use building can host five commercial businesses in addition to a shared lobby for the residential units on the first floor. An additional six units of office or administrative space are planned on the second floor. Community spaces on the roof and between residential wings gives residents a chance to congregate, and may include a rooftop playground, pool, or event space. A slightly set-back ground floor commercial area can host street furniture, plants, and other pedestrian friendly amenities, bringing livelihood to this stretch of Ponce.



Looking Forward - Expected Hurdles

Zoning Restrictions

The current RG-3 zoning has a maximum FAR of .696, with churches, multi-family housing, supportive housing, and mixed use as primary uses. No more than 5% of allowable FAR may be used for developments of 50 units or more, severely limiting the developable capacity of the site. As a workaround, the site may receive TDRs. A rezoning to MRC - currently being advocated for by neighboring groups - would also allow the proposed development to move forward. Our proposed building concept complies with the Transitional Height Plane regulations that apply to this site.

Funding

DHPC's location and proposal makes it a strong candidate for 9% LIHTC financing, with the following challenges:

1. Druid Hills would have to partner with an experienced LIHTC developer to be eligible.
2. LIHTC cannot fund commercial uses. A condo structure that separates commercial and residential uses into distinct legal entities is a novelty in Georgia, but done elsewhere. Legal counsel would be required.
3. Parking costs can be partially subsidized but will require a cost waiver from Georgia DCA.



The Greater Piney Grove Baptist Church

In response to the pressures on the single-family residence market, and in alignment with their mission as the “church with helping hands”, the Greater Piney Grove Church partnered with our studio to begin envisioning delivering single-family, tiny homes on their land. With rising housing costs in the area, developing tiny homes is an innovative solution to offer cost savings for both the future tenant and developer. Our “congregation sponsorship model” offers a bold strategy that ensures these tiny homes are truly affordable for families. Besides affordability innovation, our proposed Grove Hills community navigates the church’s challenging 52 acres of land by identifying a developable site. 15 tiny homes sit on a 2.5-acre site that harmonizes with both the natural landscape and existing single-family residential neighborhood. Overall, Grove Hills offers an opportunity for low-income families to gain first-time home ownership and the Greater Piney Grove Church continues to be part of the solution for affordable housing.

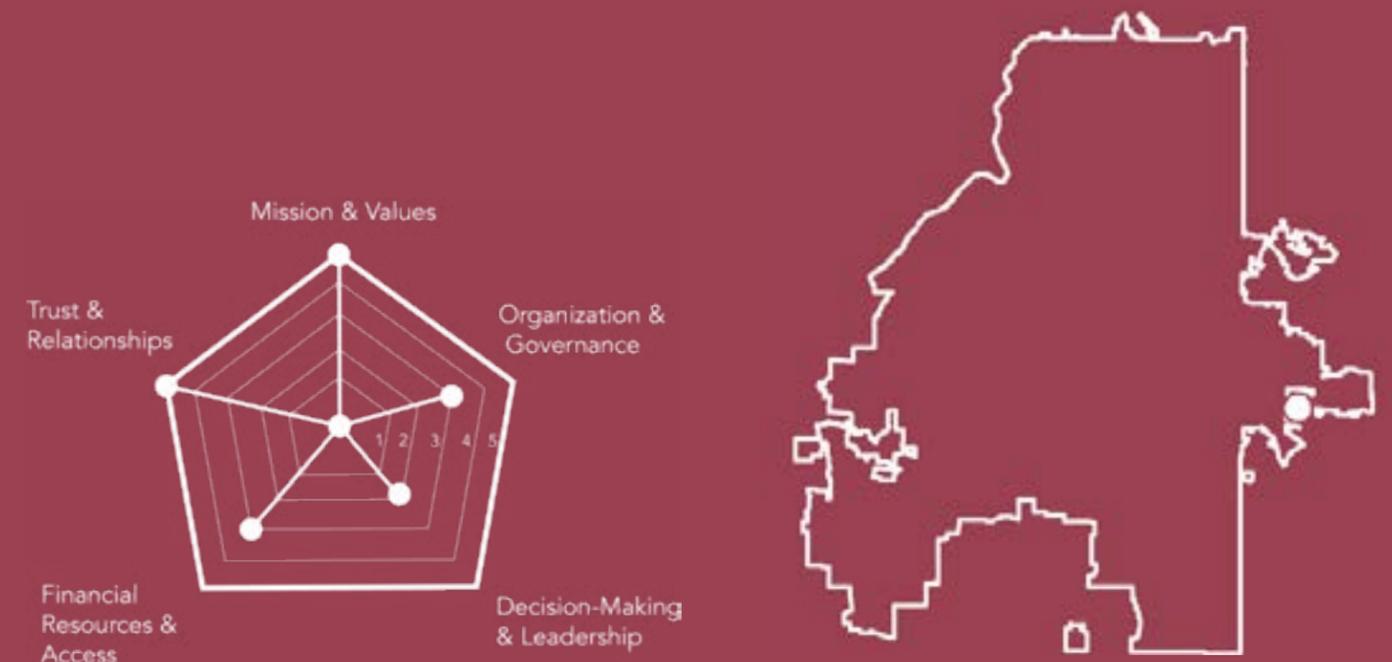
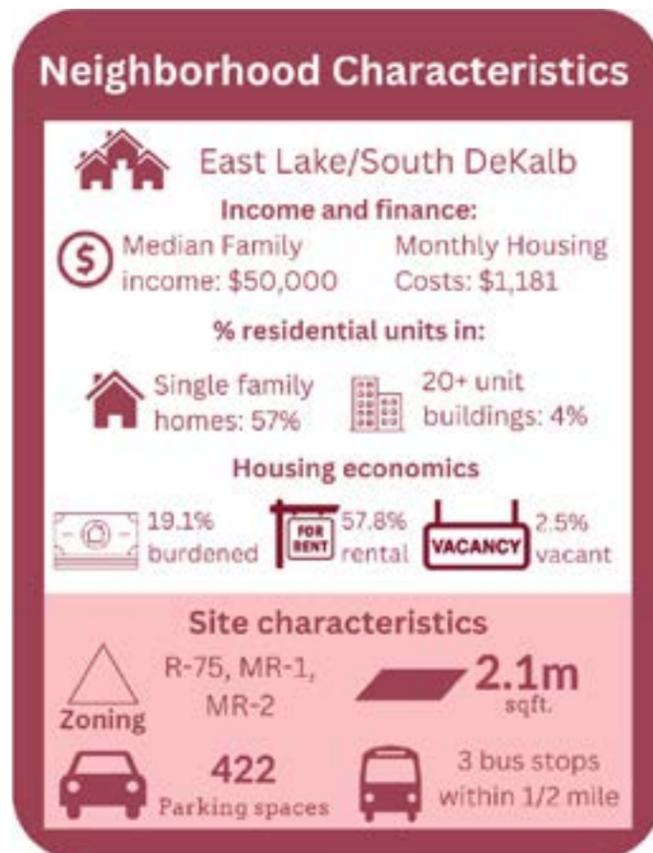




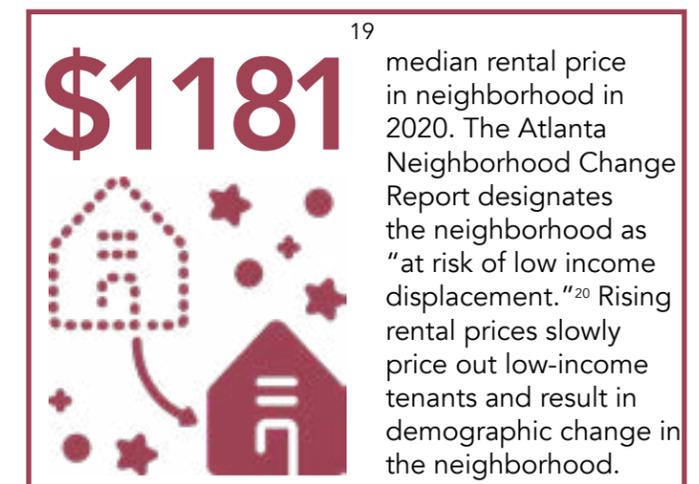
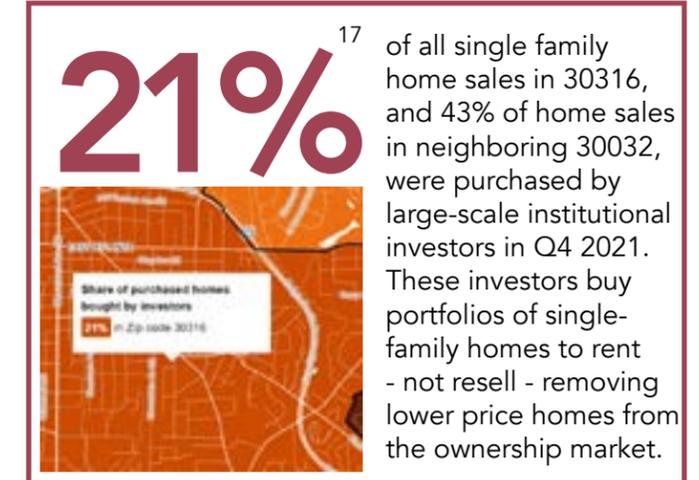
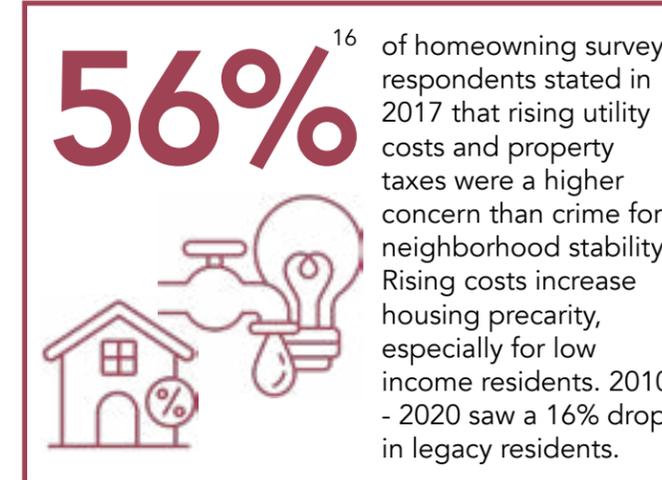
Figure 20. The Greater Piney Grove Baptist Church

“The church with helping hands”: The Greater Piney Grove Baptist Church’s mission is to provide refuge and services and to improve the well-being of all those connected with the church and its community. The church originated in 1914 in Sweet Auburn to cater to underprivileged and working class members in the otherwise thriving neighborhood. Greater Piney Grove flourished among the great historical Black churches in Sweet Auburn until the pastor at the time, Frank Jones, following suburbs-bound congregants, moved the church to an all-white bedroom community in unincorporated DeKalb County in 1971.

The church owns 52 acres off I-20, just outside the Atlanta’s eastward boundary. In the 1980s and 90s, nearby East Lake was considered one of Atlanta’s most disinvested, dangerous neighborhoods. Most of the East Lake community was displaced in the 1990s by a pilot of HOPE VI, a controversial public housing demolition program. The surrounding area consists of a mixture of commercial, multifamily, and single-family developments.



Neighborhood change by the numbers



Ingredients for a solution

Church Land

Greater Piney Grove’s 52 acres of land is a valuable asset owned by a trusted, long-term community anchor that can be leveraged to help relieve the single-family market in the area.



Community Land Trust

Splitting land and housing costs reduces the size of necessary down payment and future mortgage payments. 50- to 99-year leases with resale limitations ensures long-term affordability and stability.

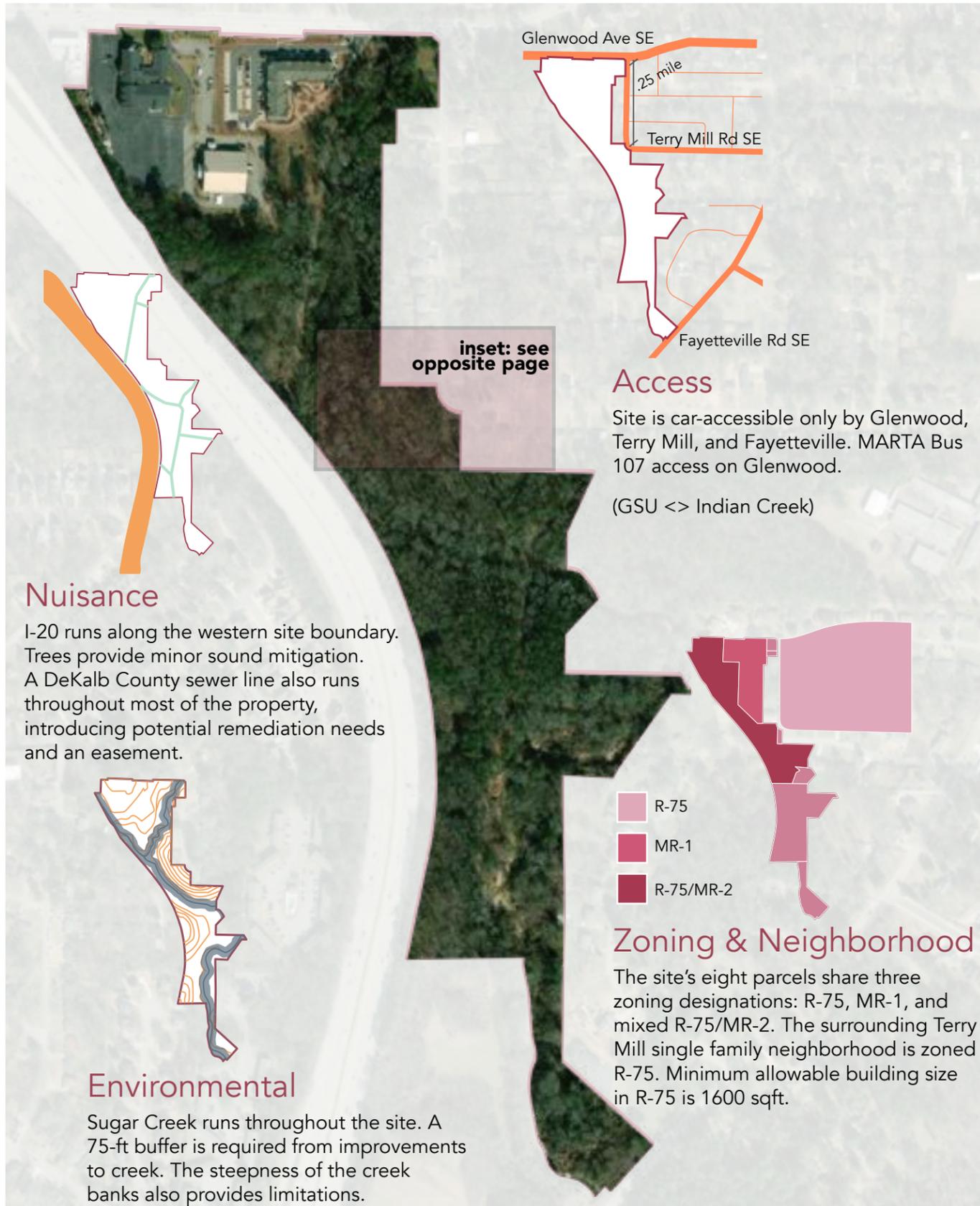


Tiny Homes

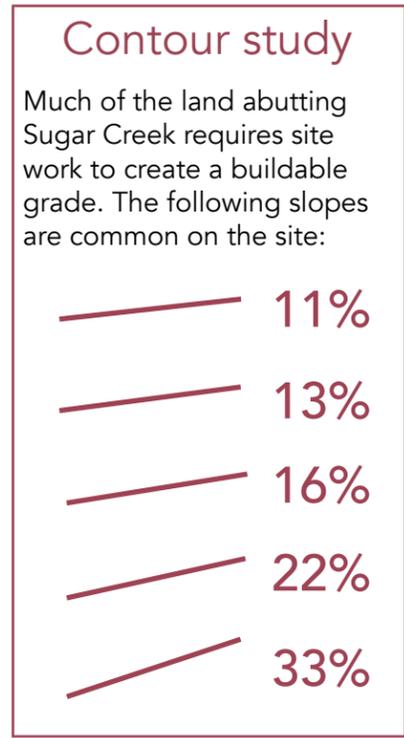
Tiny homes offer an affordable option for homeownership, especially for transitioning households. The smaller footprint offers a lower sale price, broadening access and lowering tax and utility costs.



A challenging 53 acres



Site selection - specific



Final site selection

Acreage: 2.5
Grades: 11% - 18%
Zoning: R-75; MR-1; MR-2

With the exception of areas along Glenwood Ave., few parts of the site are perfectly suitable for development. Because of its distance from I-20, Sugar Creek, and the sewer easement, as well as its access via Terry Mill Rd., the center-eastern portion of the site was chosen. The site was further reduced to areas with less than 20% slope.



Grove Hills: Tiny Homes on a Hill

Building a New Nest

Greater Piney Grove's new Grove Hills site provides young families with starter homes and independent-living seniors the opportunity to downsize - both increasingly rare in the Terry Mill community. The small footprints also minimize utility and annual tax costs.

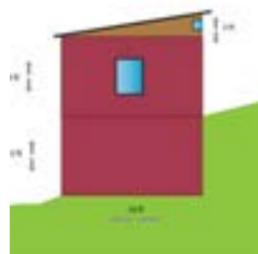
To maximize affordability and accessibility, we imagine a tiny home community with 15 homes and 19 parking spots. The homes and 24-ft. road are oriented along the contours of the site to harmonize with the existing environment.

Homes range from 480 to 670 square feet and are clustered in groups of three to four. Outdoor community spaces and pathways provide areas to mingle and connect with neighbors. In the future, a system of paths could provide recreation and connect the homes to Sugar Creek and the church's main campus.

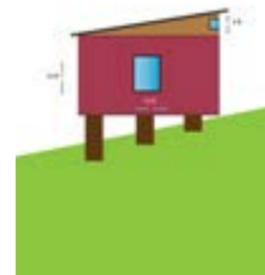


Choosing the right foundation

A few options exist to build into the steeper slopes on campus. Cut and fill is more expensive and involves changes to the land, whereas elevated foundation involves extensions to the building. Selection may depend on ownership split in the land trust.



Cut and fill excavates slopes, removing soil from some areas and packing it into others.



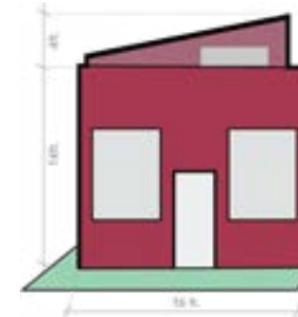
Stilts or elevated foundation requires wood, steel or concrete foundation.



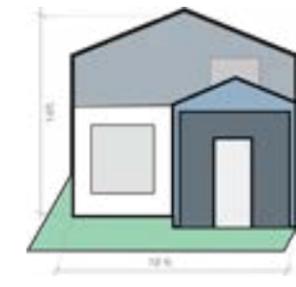
Example of stilt construction tiny home in California. Source: June Bhongjan, Apartment Therapy

Typology Study - Tiny Homes

Dekalb County allows tiny homes with 800ft. maximum building footprint. To integrate into the existing neighborhood, Grove Hills will have homes ranging from 448 to 672 sqft.



448 sqft. with one ground floor bedroom and study loft. Great for downsizing older couple



540 sqft. with 2 ground floor bedrooms. A starter home for a young family or worker to build starting equity



670 sqft. with 2 ground floor bedrooms. A more spacious home e.g. for a young family with school-age child

It (may) take a Village Funding and structuring from the ground up

Recent projects in the Atlanta area show that tiny homes promise affordability, they don't always deliver. Delivering long-term affordability is a challenge, especially in an environment where building costs, interest rates, and high taxation drive housing costs ever higher. The following model introduces a novel sponsorship model to help families reduce their down payment and monthly payments.



Subsidized or grant-funded land improvements, e.g. via EPA Brownfield or Community Work grants, fee interest mortgaging, or private sector funds



Congregation sponsorship for downpayment can take an equity or low-interest loan model (see across). 25% appraisal resale method allows balanced wealth accrual by residents.



State of Georgia grants an exemption of all ad valorem taxes for church-owned single family homes. Exemption must be vetted for ground lease model and may require different structure.

In the sponsorship models, groups of 10-20 church families "sponsor" a Grove Hills household and contribute to their downpayment to reduce mortgage size and private mortgage insurance needs.

Housing costs: \$150K

APR: 7%, 30-year mortgage
Total family down payment: \$20K (13%)
Total village down payment: \$20K (13%)
Monthly mortgage payment: \$732
Taxes: \$0, Insurance: \$50
Re-appraisal in year 5 (resale): \$170K

Appraised appreciation:
\$20K; x 25% = \$5K wealth
Actual resale: \$155K (\$150K + \$5K)

Scheme 1: Equity model

Total monthly payment: \$782
Equity payout to family (resale): \$20K + \$2.5K
Equity payout to village (resale): \$20K + \$2.5K

Scheme 2: 0% loan model

Monthly lease payments to village: \$83
Total monthly payment: \$865
Equity payout to family: \$40K + \$5K
Loan payoff to village at resale: \$10K

Conclusion

To actively call on faith leaders to contribute to housing production and stabilization, earnest policy changes are required that recognize the unique assets and challenges associated with FBAH.

Reflections on the FBAH Studio

Housing is a core component of all urban systems – financial, legal, social, political, economic, cultural, familial, and individual. Decent, stable, affordable housing is essential for individual and communal wellbeing. And yet housing is incredibly complex to build, maintain, and rehabilitate. In Atlanta, the traditional systems for housing delivery continuously underperform and treat rapid displacement, gentrification, and unaffordability as the unavoidable outcome of a housing market “in high demand.” At the same time, political leaders proclaim that widespread housing precarity and exclusion are not components of a sustainable, just city. Faith based leaders in Atlanta have been called on to be agents for good – to contribute to the changes that would allow for better, more stable, more inclusive housing. As our report shows, many faith leaders have heard the call.

If developing and operating affordable housing is difficult for traditional developers, it is even more cumbersome for FBOs that lack the experience, institutional connections, legal structures, legitimacy, and profit motivation to compete in the housing market. Throughout our research and work, we have noted how and where faith leaders develop *differently* than others. We have shown how their patience, deliberation, and relationship to prayer and risk lead them to make decisions unthinkable to orthodox developers. We have outlined common knowledge gaps, while also emphasizing the many assets that FBOs bring to the table. Our goal was to encourage FBOs to value their assets as serious contributions and to not let them be taken for granted. Moreover, we have demonstrated many examples where the “rules” of law, finance, organizations, and politics have appeared as unmovable barriers only to be bent and broken by strategic, driven faith leaders willing to do things differently. Despite the many inspirational examples of

FBOs’ work, we also documented moments where political and economic actors have abused FBOs and the trusting relationships they have with their parishioners in order to make a quick gain.

To actively call on faith leaders to contribute to housing production and stabilization, earnest policy changes are required that recognize the unique assets and challenges associated with FBAH. As we worked with our faith partners, we were able to critically reflect on the policy environment in which they were being asked to act. While we commend the Mayor’s Faith Based Development Initiative for its nuanced understanding of the needs of many FBOs in the earliest stages of development, we have compiled a collection of policy recommendations that we believe would facilitate more houses of worship to see their developments through. Ultimately, these recommendations aim to ensure that FBOs are able to pursue their missions through housing – not just that they are asked to contribute their land to someone else’s vision.



Figure 21. Group Members at the November 16th presentation.

Policy Recommendations

ZONING

Zoning rewrite: The City of Atlanta is currently undergoing an ambitious rewrite of its decades-old zoning code. For the next year, community workshops will be held that solicit input and allow the public to raise issues. **Faith leaders** need to organize and be at the table, and get involved in the rewrite process.

Rethink R-4: **FBOs** should advocate for moderate flexibility in R-4 zoning during the rewrite. Many FBOs located in R-4 zoning can only build housing by blurring the boundaries of what they can legally consider their “mission.” It should not be on FBOs to take on this legal risk.

Zoning overlay: Pasadena, CA and Seattle, WA each passed FBAH zoning overlays that grant minimum density of 32 units/acre to FBO-owned land building affordable housing. The State of California is considering similar legislation. Noting that FBOs are valuable partners whose longevity, sensitivity to headline risk and faith-driven mission impact their approach to housing over the long term, the **Atlanta City Council** should consider a similar overlay to advance the FBDI.

Rezoning: **FBOs** that seek zoning variances to build affordable housing should make their religious affiliation visible. Leaders who wear collars and a critical mass of respected members of the congregation should be in attendance for community events, NPU meetings, and review boards.

TDRs: The current TDR code is effectively non-functional. The zoning rewrite process has not given much public attention to what will happen with the TDR ordinance. The zoning rewrite process is an opportunity **FBOs with landmark status** to bring TDRs to the attention of the rewrite team. Some TDR rules will have to be changed at the state level. In particular, TDR usage to build affordable housing should be

added to existing state legislation.

More TDR recommendations can be found on page 59.

Density Allowances: The **City's Office of Permitting** should simplify the process for obtaining density permits, especially for FBOs in growth areas. Each of our projects would have required a rezone to successfully build affordable housing.

Parking: For growth corridors like Ponce, which are walkable and transit-adjacent, parking reduction or elimination should be allowed. The City's **Department of City Planning**, together with the **Atlanta Department of Transportation** and the **Mayor's Office of Sustainability** should publish a “carless Atlanta” plan that invests significant federal money from the Bipartisan Infrastructure Bill to reduce car dependency in the City. This plan would signal to financial institutions that they can underwrite parking reductions with the City's commitment.

Tiny Homes: DeKalb County ordinances currently allow homes on single-family sites with small footprints (less than 800 sqft.). However, other spatial requirements such as lot sizes, setbacks, and width are set by the zoning designation. **DeKalb County** should create a consistent Tiny Home ordinance like in Decatur or Clarkston would create better cohesion between building, lot, and neighborhood.

A precedent example is Ordinance 677-Pertaining to Tiny Houses passed by Spur, Texas in 2016. This ordinance permits tiny homes in the city by right, but established that variances are needed for tiny homes to be built in certain subdivisions. This ordinance does not allow tiny houses on wheels and requires each tiny house to have a foundation.

FINANCE

Non-LIHTC sources: Too many FBOs are expected to rely on LIHTC funding to pursue affordable housing. Atlanta's LIHTC funds are limited, extremely competitive, and give preference to developers with LIHTC

experience. Asking FBOs to participate in LIHTC is financially risky and requires them to partner with developers whose missions may not be aligned. Moreover, reliance on federal funds limits FBOs' ability to select their own tenants – often a priority for congregations seeking to provide opportunities for parishioners to age in place. **The City of Atlanta** has promised for years to develop a local affordable housing trust fund to provide major cash infusions into the city's affordable housing ecosystem. To date, no programs have been announced with enough scale to make an impact. The City needs to create this Trust Fund and develop rules of the program with FBOs who already have the land, vision, and partnerships to move forward. Washington D.C.'s trust fund may serve as a good prototype. The trust fund should provide substantial funds for rehabilitation and adaptive reuse.

LIHTC diversification: Current LIHTC rules are structured to fund two types of developments: 80-100 unit projects at 50%-60% AMI and 200+ unit projects at 50%-80% AMI. Most FBOs do not have the space or desire to build such large projects, instead preferring moderate-footprint, 10-50 unit developments that scale better to their existing buildings. By providing application assistance, fee waivers, **Georgia DCA** and **Invest Atlanta** could reduce the fixed costs of a LIHTC application enough to make smaller projects viable. Diversifying LIHTC-funded projects may also represent a more efficient use of program funds.

LIHTC condominiumization pilot: The City of Atlanta's **Housing Innovation Lab** should launch a pilot to demonstrate how to use LIHTC funds for only part of a development. FBOs often want to mix affordable housing with parishioner housing, administrative functions, or commercial spaces. Although creating separate “condominiums” for each of these uses is common practice in California and Illinois (among other places), it is rarely done in Georgia. The City can serve as a partner to test and share this process with FBOs.

Charitable Choice: As more municipalities look for ways to combat the rise in housing, the **federal government** should revisit the Charitable Choice provision of the Community Services Block Grant program for ways to streamline the process for faith-based organizations to receive funding towards sustainable long-term affordable housing projects.

OTHER

Permitting: Many FBOs are not experienced developers and yet are required to undergo the same bureaucratic processes as traditional developers. The City's **Office of Building and Permits** should develop an expedited permitting process for affordable housing, and a case manager system for FBOs could reduce lawyer and consultant fees needed to navigate administrative systems.

Coalition building: Cities like Los Angeles, Pasadena, London, and Atlanta in the past show that when FBOs join into coalitions, they are most effective at pushing for policy changes. **FBOs** should find venues to discuss vision, funding, and policy together. Many grant programs in recent ambitious federal legislation are available to non-profit organizations. Atlanta FBOs should join together to identify upcoming sources of money, found an eligible receiving organization, and develop a vision to mobilize funds. **The City of Atlanta** should expand their current FBDI programming to actively encourage coalition forming among participant FBOs.

Private Finance: Developing differently often begins with convincing a bank that financing your project is worth risking the unknown. **Financial regulators** should encourage banks to participate in FBAH and change their underwriting standards to account for the different type of organization that an FBO is. Over time, FBAH projects may be seen as auto-qualifiers for certain types of financial objects. Although a recent comment period for CRA changes has ended, this may be a subject for future updates of the law.

Endnotes - Part Two

- 15 Juergensmeyer, J. C., Nicholas, J. C., & Leebrick, B. D. (1998). Transferable development rights and alternatives after Suitum. *Urb. Law.*, 30, 441.
- 16 U.S. Census Bureau. (2020) 2016-2020 ACS 5-year estimates.
- 17 The Grove CDC, Dekalb County Office of Senior Affairs, Metro Atlanta Urban Farm. (2017). Terry Mill Community Transformation Plan. The Grove CDC.
- 18 Schaul and O'Connell (2022, February 16). "Investors bought a record share of homes in 2021. See where." *Washington Post*. URL: <https://www.washingtonpost.com/business/interactive/2022/housing-market-investors/>
- 19 Zillow. (n.d.). Atlanta Ga real estate - Atlanta Ga Homes For Sale. Zillow.
- 20 Office of Housing & Community Development. (2021) Neighborhood Change Report. City of Atlanta Department of City Planning.

Appendix

Appendix A: Workshops

1st Stakeholder Presentation: Preliminary Results

October 19, 2022

Over five months, this studio group engaged in a collaborative process with our site partners and key stakeholders for the four sites we worked on. Alongside site visits, one-on-one interviews, and ongoing communication, we hosted two two-hour workshops to present and discuss our progress and solicit input.

The first workshop was held on October 19 and aimed to summarize our to-date findings of the respective sites, as well as as each of our partners' key goals and challenges. Representatives from each of our partner institutions, as well as from Georgia Tech and the City of Atlanta were in attendance.

We kicked off by providing the group with an overview of the need for affordable housing and with national examples of faith-based organizations that are currently engaged in affordable housing. This was also the first time that the five-part model was introduced to our partners as a way to synthesize our findings.

After this lengthy introduction, we introduced each partner, and discussed their current site, goals, assets, and challenges. We proposed



Figure 22. Example of site planning and ideation with partners at October 16th meeting.

multiple alternatives for each site. After each site presentation, partners gave feedback on our findings and helped us decide on a direction to focus our next steps.

To take advantage of this rare opportunity to get everyone around the same table, we planned for a lot of interactive time, including idea boards where guests could provide input to prompts and exchange stories with one another. They were asked to describe their past work, inspiring examples, as well as to identify their positions within our five-part model - data that was used in our infographics in this report.

We also pinned up site maps for each partner. After the presentation, studio members conversed with their partners at the maps, refining our ideas directly on paper (see Figure 22). These conversations were the source of some of our most detailed, creative, and helpful feedback that helped inform our final design recommendations.

Attendees

- Central Presbyterian Church
 - Gary Cornell
 - Jerry Miller
- Congregation Shearith Israel
 - Jodi Manbach
- Druid Hills Presbyterian Church
 - Elizabeth Acton
 - Eric Dusenbery
- Greater Piney Grove Baptist Church
 - Pastor Chianti Harris
 - Joe Collums (VP of GA Communities)
- Other Affiliations
 - Micheal Dobbins (Georgia Tech)
 - Wesley Myrick (City of Atlanta)

2nd Stakeholder Presentation: Final Proposals

November 16, 2022

On November 16, our group held its second all-stakeholder workshop where we presented a more complete version of our analytical framework and our final proposals for each of the four partner sites. We extended invitation to this meeting to a wider audience to increase the breadth of feedback and discussions.

For this second meeting, we hung 24"x36" posters of each of our design proposals for review, as well as an overview of our historical research and timeline. We used this meeting to present an overview of our non-site-specific research, including our historical research, current affordable housing landscape, and operationalization of the five-part model with national and local examples.

Each site leader then presented their design narrative and proposal for each of the four sites. After the presentations, partners were given a last opportunity to provide input and feedback before the final report.



Attendees

- Central Presbyterian Church
 - Jerry Miller
- Congregation Shearith Israel
 - Jon Effron
- Druid Hills Presbyterian Church
 - Elizabeth Acton
 - Eric Dusenbery
- Greater Piney Grove Baptist Church
 - Pastor Chianti Harris
 - Joe Collums (VP of GA Communities)
 - Julius Derico
- Other Affiliations
 - Micheal Dobbins (Georgia Tech)
 - Chelsea Arkin (Atlanta Beltline)
 - Dennis Richards (Atlanta Beltline)

City of Atlanta workshops

Much of the research on contemporary FBAH initiatives featured in this report was conducted by visiting the City of Atlanta's monthly FBDI workshops at St. Luke's Episcopal Church in Downtown Atlanta. These workshops featured presentations by FBOs and development professionals from around the city and took place on:

August 25, September 22, October 27, November 17, and December 8.

Appendix B: Potential TDR Recipients

Address	Lot Area (sqft)	Lot Area (acres)	Developable Area (sqft)	TDR Appetite	Zoning	Land Use	Owner	Currently Built?
2585 Beeler Dr SW	116,869	2.68	40,670	259,330	RG-2	MDR	Venture Village Inc	No
0 Rosewood Way	136,966	3.14	47,664	252,336	RG-2-C	MDR	Collier Pointe Community	No
1952 Browns Mill Rd SE Rear	154,364	3.54	53,719	246,281	RG-2	HDR	Southview Cemetery Association Inc	No
0 Jonesboro Rd SE	165,482	3.80	57,588	242,412	RG-2	HDR	Double Corp Of Atlanta The	No
415 Fairburn Rd SW# Rear	100,175	2.30	69,722	230,278	RG-3	MDR	Hidden Hollow Limited Partnership	No
3782 M L King Jr Dr NW	101,686	2.33	70,774	229,226	RG-3	MDR	Murphy Clinton A	No
1388 Northwest Dr NW	103,611	2.38	72,114	227,886	RG-3	MDR	One Three Nine Zero Northwest Dr LLC	No
2640 Whiting St NW	105,811	2.43	73,644	226,356	MRC-1	MUHD	Willis Family Partnership LP The	No
0 Hightower Rd NW	110,008	2.53	76,566	223,434	RG-3	MDR	Cypress Grove Land Fund LLC	No
0 Hollywood Rd NW	110,836	2.54	77,142	222,858	RG-3	MDR	Spring Grove Partners LLC	No
1057 Constitution Rd SE	113,975	2.62	79,326	220,674	MR-3	MDR	Rayasam Ravindra	No
0 Mc Donough Blvd SE	231,974	5.33	80,727	219,273	MR-2-C	MDR	Salvo Michael & Alessandro V	No
0 North Hightower Rd	118,139	2.71	82,225	217,775	RG-3	MDR	Cypress Grove Land Fund LLC	No
1770 Bolton Rd NW	119,344	2.74	83,063	216,937	MR-3-C	MDR	M & M Riverside Investments LLC	No
1765 New South Pryor Rd	121,562	2.79	84,607	215,393	RG-3-C	MDR	Westside Revitalization Acquisitions LLC	No
1410 CoNW ay PI NW	121,707	2.79	84,708	215,292	RG-3	HDR	Mac Holdings Of Fulton County LLC	No
0 Jonesboro Rd SE	273,822	6.29	95,290	204,710	RG-2	HDR	Lee David	No
0 Gun Club Rd NW	146,365	3.36	101,870	198,130	RG-3	MDR	Crossstone Management LLC	No
0 Gun Club Rd NW	146,365	3.36	101,870	198,130	RG-3	MDR	Southern Cross Financial LLC	No
2240 Verbena St NW	147,698	3.39	102,798	197,202	RG-3	MDR	Mj Partners Real Estate Holdings LLC	No

Address	Lot Area (sqft)	Lot Area (acres)	Developable Area (sqft)	TDR Appetite	Zoning	Land Use	Owner	Currently Built?
0 Hollywood Rd NW	148,217	3.40	103,159	196,841	RG-3	MDR	Laurens Holdings LLC	No
0 Hollywood Rd NW	148,217	3.40	103,159	196,841	RG-3	MDR	Laurens Holdings LLC	No
1147 Hollywood Rd NW	153,861	3.53	107,087	192,913	RG-3	MDR	Laurens Holdings LLC	No
0 Constitution Rd SE	154,896	3.56	107,808	192,192	RG-3-C	MDR	Lieu Corp	No
0 Jackson Pkwy NW	171,370	3.93	119,273	180,727	RG-3	MUHD	Atlanta Housing Authority Bowen Homes 6-12	No
0 Nash Rd NW # Rear	180,815	4.15	125,847	174,153	RG-3	MDR	Whittier Mill Village LLC	No
0 Proctor Creek NW	190,212	4.37	132,388	167,612	RG-3	MDR	Laurens Holdings LLC	No
1071 Fayetteville Rd SE	198,195	4.55	137,944	162,056	RG-3-C	MDR	Zongor Michael E	No
0 Johnson Rd NW # Rear	203,435	4.67	141,591	158,409	RG-3	MDR	Georgia Power Company Tax Dept Bin 10120	No
0 Camp Creek Pkwy SW	239,322	5.49	166,568	133,432	RG-3-C	MDR	Fulton County	No
2000 Perry Blvd NW	254,383	5.84	177,051	122,949	RG-3	MDR	Westside Revitalization Acquisitions LLC	No
2288 Peachtree Rd NE	284,199	6.52	197,803	102,197	RG-3	MDR	Enclave At Peachtree Road Homeowners Association Inc The	No
0 Hollywood Rd NW	290,750	6.67	202,362	97,638	RG-3	MDR	Cypress Grove Land Fund LLC	No
0 Johnson Rd NW	291,457	6.69	202,854	97,146	RG-3	MDR	City Of Atlanta	No
2790 Donald Lee Hollowell Pkwy NW	131,707	3.02	223,376	76,624	C-1	MUMD	United Holdings II LLC	No
1688 Peachtree St NW	119,644	2.75	239,288	60,712	I-1	MDR	Southern Railway A & C Div	No
2770 Donald Lee Hollowell Pkwy NW	160,379	3.68	272,002	27,998	C-1	MUMD	Maliyha Inc	No
2640 Campbellton Rd SW	108,082	2.48	37,613	262,387	MR-2-C	MDR	Regal Heights LLC	Partial
2545 Jonesboro Rd SE	109,695	2.52	38,174	261,826	RG-2	MDR	Bailey Stuart	Partial
2905 Third Ave SW	129,669	2.98	45,125	254,875	RG-2	MDR	Villas 2905 3rd Ave LLC	Partial
480 Peachtree Hills Ave	175,611	4.03	61,113	238,887	RG-2	MDR	Papth Owner LLC	Partial

Address	Lot Area (sqft)	Lot Area (acres)	Developable Area (sqft)	TDR Appetite	Zoning	Land Use	Owner	Currently Built?
430 Lindbergh Dr NE A 6	188,953	4.34	65,756	234,244	RG-2	MDR	Andujar Bruce & Marie	Partial
3150 Howell Mill Rd NW	105,280	2.42	73,275	226,725	RG-3-C	MDR	Central Board On Care Jewish Aged Inc	Partial
0 Hollywood Rd NW	105,352	2.42	73,325	226,675	RG-3	MDR	Legend Development Properties LLC	Partial
3951 Campbellton Rd SW	106,149	2.44	73,880	226,120	MR-3-C	MDR	Fellowship Of Faith Church Intl Inc	Partial
1514 Northwest Dr NW	109,777	2.52	76,405	223,595	RG-3	MDR	Greenleaf Investment Partners L040 LLC & Summer Gate LLC	Partial
230 Stovall St SE	113,549	2.61	79,030	220,970	MR-3-C	MDR	Second Mount Vernon Baptist Church	Partial
257 Amal Dr	118,119	2.71	82,211	217,789	RG-3-C	MDR	Westside Revitalization Acquisitions LLC	Partial
840 Center Hill Ave NW	124,369	2.86	86,561	213,439	MR-3	MDR	Johnnie B Moore Towers II Inc	Partial
0 Harlan Rd SW	124,980	2.87	86,986	213,014	RG-3	MDR	Glade Development Inc	Partial
959 Constitution Rd SE	126,484	2.90	88,033	211,967	MR-3	MDR	Holy Hill Church Of God In Christ	Partial
2205 Verbena St NW	127,837	2.93	88,974	211,026	RG-3	MDR	MJ Partners Real Estate Holdings LLC	Partial
1097 Hollywood Rd NW	130,535	3.00	90,852	209,148	RG-3	MDR	King Arthur L Jr & Cora R	Partial
1941 Cheshire Bridge Rd	262,047	6.02	91,192	208,808	RG-2	MDR	Wellbourne Development LLC	Partial
1791 Piedmont Ave NE	136,926	3.14	95,301	204,699	MR-3A-C	MDR	Toll Southeast LP Company Inc	Partial
3467 Benjamin E Mays Dr SW	145,793	3.35	101,472	198,528	RG-3	MDR	Tri Septe Mdevelopers Inc	Partial
3301 North Camp Creek Pkwy	147,265	3.38	102,497	197,503	RG-3	MDR	Greenbriar Mill Pcppe LLC	Partial
1950 Sylvan Rd SW	296,450	6.81	103,165	196,835	RG-2	MDR	Fulton County City Of Atlanta Land Bank Authority Inc	Partial
222 Colonial Homes Dr Unit Tr 1	158,280	3.63	110,163	189,837	RG-3	MDR	Mach II Psreg Owner LLC	Partial

Address	Lot Area (sqft)	Lot Area (acres)	Developable Area (sqft)	TDR Appetite	Zoning	Land Use	Owner	Currently Built?
0 Peyton Pl SW	159,115	3.65	110,744	189,256	RG-3	MDR	Allergy Doc LLC et al.	Partial
1643 Mc Callie Blvd NW	162,956	3.74	113,417	186,583	RG-3	MDR	Georgia Power Company	Partial
2645 Whiting St NW	170,394	3.91	118,594	181,406	MRC-1	MUHD	West Atlanta Healthcare Properties Inc	Partial
3706 M L King Jr Dr SW	170,954	3.92	118,984	181,016	RG-3	MDR	Asset Holdings Inc	Partial
1625 Jackson Pkwy NW	176,538	4.05	122,871	177,129	RG-3	MDR	Rjs Property Holdings LLC	Partial
2610 M L King Jr Dr SW	188,648	4.33	131,299	168,701	RG-3	MDR	Housing Auth City Of Atlanta	Partial
1090 Hollywood Rd NW	209,434	4.81	145,766	154,234	RG-3	MDR	Manor Partners VII LLC	Partial
0 Boulder Park Dr SW	214,578	4.93	149,346	150,654	RG-3	MDR	Crystal Heights LLC	Partial
396 Brownlee Rd SW	217,385	4.99	151,300	148,700	RG-3	MDR	Towne West Manor LP	Partial
2248 Alston Dr SE	235,241	5.40	163,727	136,273	RG-3-C	MDR	Housing Authority Of The City Of Atlanta	Partial
249 Cleveland Ave SW	112,496	2.58	190,794	109,206	C-1	MUMD	Cleveland Enterprises Corp	Partial
2585 Beeler Dr SW	116,869	2.68	40,670	259,330	RG-2	MDR	Venture Village Inc	Yes
3703 Peachtree Rd NE	118,432	2.72	41,214	258,786	RG-2	MDR	3703 Peachtree LLC	Yes
1125 Dolphin Dr SW	121,232	2.78	42,189	257,811	RG-2	MDR	Dolphin Qoz Fund LLC	Yes
3675 Peachtree Rd NE # 23	129,746	2.98	45,152	254,848	RG-2	MDR	Baker Maxwell	Yes
1000 Collier Rd NW	133,449	3.06	46,440	253,560	RG-2	MDR	Thomas Preston Investments LLC & Bfg Investments LLC	Yes
1061 SEaboard Ave NE	134,447	3.09	46,788	253,212	RG-2	HDR	Inman Station Ltd	Yes
3660 Peachtree Rd NE # A 3	145,563	3.34	50,656	249,344	RG-2	MDR	Goodman Jacquelyn L	Yes
2011 Defoor Ave NW	148,199	3.40	51,573	248,427	RG-2	MDR	South Investment Corp	Yes
764 Highland Ave NE	100,065	2.30	69,645	230,355	MR-3-C	MDR	Highland Park Townhome Association Inc	Yes

Address	Lot Area (sqft)	Lot Area (acres)	Developable Area (sqft)	TDR Appetite	Zoning	Land Use	Owner	Currently Built?
606 Ansley Villa Dr NE # 606	201,734	4.63	70,203	229,797	RG-2-C	MDR	Candace Chapman Living Trust	Yes
845 Lawton St SW	208,983	4.80	72,726	227,274	RG-2	HDR	South Atlantic Conference Association of Seventh Day Adventists	Yes
0 Techwood Dr NW	104,548	2.40	72,765	227,235	RG-3	MDR	Regents Univ System Of GA	Yes
3535 Roswell Rd NE # B 2	107,433	2.47	74,773	225,227	RG-3	MDR	Ebony & Ivory Towers LLC	Yes
136 Peachtree Memorial Dr NW # 10-4	107,491	2.47	74,814	225,186	RG-3	MDR	Jandoc Valerie	Yes
229 Peachtree Hills Ave 10	109,598	2.52	76,280	223,720	RG-3-C	MDR	Dalton Jo Ann	Yes
1930 Flat Shoals Rd SE	109,675	2.52	76,334	223,666	RG-3-C	MDR	LC Broadway East LLC	Yes
1514 Northwest Dr NW	109,777	2.52	76,405	223,595	RG-3	MDR	Greenleaf Investment Partners L040 LLC & Summer Gate LLC	Yes
290 Lakemoore Dr NE	111,182	2.55	77,383	222,617	RG-3	MDR	Multiple (Condos)	Yes
0 Hunnicutt St NW	111,558	2.56	77,644	222,356	RG-3	MDR	Atlanta Housing Authority	Yes
294 Brownlee Rd SW	111,834	2.57	77,836	222,164	RG-3	MDR	Shenandoah Properties LLC	Yes
2012 Memorial Dr SE	113,076	2.60	78,701	221,299	MR-3-C	MDR	EA Homes LP	Yes
0 Christina St NW	114,890	2.64	79,963	220,037	RG-3	HDR	Multiple (Condos)	Yes
0 Briarcliff Rd NE	114,939	2.64	79,997	220,003	RG-3	MDR	Residences At Lullwater	Yes
0 Pine St NW	117,224	2.69	81,588	218,412	RG-3	MDR	Atlanta Housing Authority	Yes
227 Virginia Ave	118,328	2.72	82,356	217,644	RG-3-C	MDR	Hillgrove Townhome Association Inc	Yes
1026 Ponce De Leon Ave NE	119,264	2.74	83,008	216,992	RG-3	MDR	Druid Hills Presbyterian Church	Yes
1350 Mayson Turner Rd NW	123,585	2.84	86,015	213,985	RG-3	HDR	1350 Mayson Turner LLC	Yes
2700 Pine Tree Rd NE	254,316	5.84	88,502	211,498	RG-2-C	HDR	Multiple (Condos)	Yes
1178 Village Ct SE	128,117	2.94	89,170	210,830	RG-3	MDR	Cochran David	Yes

Address	Lot Area (sqft)	Lot Area (acres)	Developable Area (sqft)	TDR Appetite	Zoning	Land Use	Owner	Currently Built?
2948 Delmar Ln NW	128,748	2.96	89,608	210,392	RG-3	MDR	2948 Delmar Ln Pcppe LLC	Yes
1483 Arthur Langford Jr Pl SW	129,889	2.98	90,403	209,597	RG-3-C	MDR	B & R Apartments LLC	Yes
3417 Roswell Rd NE	130,152	2.99	90,585	209,415	RG-3	MDR	Peachtree Presbyterian Church Inc	Yes
875 Crew St SW	131,839	3.03	91,760	208,240	RG-3	HDR	P E P Development Ltd LP	Yes
0 East Paces Cir	132,660	3.05	92,331	207,669	RG-3-C	MDR	The Park at East Paces Townhomes Homeowners Association Inc	Yes
3164 Cushman Cir SW	133,587	3.07	92,977	207,023	RG-3-C	MDR	Lawrence Ron M Inc	Yes
905 James Jackson Pkwy	134,076	3.08	93,317	206,683	MRC-1	MUHD	Cal Properties Inc	Yes
1223 Hardee St NE	139,672	3.21	97,212	202,788	MR-3-C	MDR	Toll Southeast Lp Company Inc	Yes
45 Peyton Pl SW	144,822	3.32	100,796	199,204	RG-3	MDR	Cook Dorothy L	Yes
764 Ponce De Leon Pl NE	145,313	3.34	101,138	198,862	RG-3	HDR	Virland Properties LLC	Yes
546 Centennial Ln	145,860	3.35	101,519	198,481	RG-3	MDR	Centennial Park North Townhomes Association Inc	Yes
1240 Oakland Dr SW	151,376	3.48	105,357	194,643	RG-3	MDR	Rivertwice LLC	Yes
0 Luckie St	158,612	3.64	110,394	189,606	RG-3	MDR	Atlanta Housing Authority	Yes
3150 Howell Mill Rd NW	159,033	3.65	110,687	189,313	RG-3-C	MDR	Central Board On Care Jewish Aged Inc	Yes
0 Hunnicutt St NW	163,124	3.74	113,534	186,466	RG-3	MDR	Atlanta Housing Authority	Yes
25 Peachtree Ave NE	164,147	3.77	114,246	185,754	RG-3-C	MDR	Atlanta International School Inc	Yes
3379 Stone Rd SW	164,479	3.78	114,477	185,523	RG-3	MDR	Greenbriar Mill Pcppe LLC	Yes
3101 Howell Mill Rd NW	171,138	3.93	119,112	180,888	RG-3-C	MDR	Multiple (Condos)	Yes
0 Hunnicutt St NW	177,946	4.09	123,850	176,150	RG-3	MDR	Atlanta Housing Authority	Yes
240 Colonial Homes Dr Unit Tr 3	178,781	4.10	124,432	175,568	RG-3	MDR	Vr Coho Limited Partnership	Yes

Address	Lot Area (sqft)	Lot Area (acres)	Developable Area (sqft)	TDR Appetite	Zoning	Land Use	Owner	Currently Built?
0 Hunnicutt St NW	182,560	4.19	127,062	172,938	RG-3	MDR	Atlanta Housing Authority	Yes
1093 West Ave NW	184,161	4.23	128,176	171,824	RG-3	MDR	Balfour Crogman School LLC	Yes
0 Bowen Ave	188,358	4.32	131,097	168,903	MR-3-C	MDR	Charis Community Housing Inc	Yes
2143 Memorial Dr SE	189,910	4.36	132,177	167,823	RG-3	MDR	Atlanta Housing Authority	Yes
220 Bowen Cir	190,921	4.38	132,881	167,119	RG-3-C	MDR	Columbia High Point Estate LP	Yes
594 Wimbledon Rd NE	191,971	4.41	133,612	166,388	RG-3	MDR	Ocean Morningside Courts LLC	Yes
240 Colonial Homes Dr Unit Tr 4	193,820	4.45	134,899	165,101	RG-3	MDR	Vr Coho Limited Partnership	Yes
4011 Roswell Rd NE	194,032	4.45	135,046	164,954	RG-3	MDR	4011 Roswell Road LLC	Yes
150 Hutchinson St NE	195,133	4.48	135,813	164,187	RG-3-C	MDR	Mayson Avenue Cooperative LLC	Yes
330 Ardmore Cir NW	196,039	4.50	136,443	163,557	RG-3	MDR	Ardmore Cabrillo LLC	Yes
295 Penelope Dr NW	198,894	4.57	138,430	161,570	RG-3	MDR	True Light Haven Senior Housing Limited Partnership	Yes
1371 Kimberly Rd SW	200,399	4.60	139,478	160,522	RG-3	MDR	Atlanta Housing Authority	Yes
0 Defoor Ave NW	201,176	4.62	140,018	159,982	RG-3	MDR	Defoor Properties LLC	Yes
124 Lakeshore Cir NE	204,424	4.69	142,279	157,721	RG-3	MDR	Lakeshore Crossing Assocs LP	Yes
0 Memorial Dr SE	204,716	4.70	142,483	157,517	RG-3	MDR	Stone Gate Cottages	Yes
3315 Roswell Rd NE	206,032	4.73	143,399	156,601	RG-3	MDR	Uscmf Gramercy At Buckhead LLC	Yes
1317 Caroline St NE	218,390	5.01	151,999	148,001	RG-3-C	MDR	Columbia Court LP	Yes
2167 Bolton Dr NW	220,539	5.06	153,495	146,505	RG-3	HDR	Pulte Home Corporation	Yes
2237 Perry Blvd NW	227,916	5.23	158,630	141,370	RG-3	MDR	Greenleaf Investment Partners L033 LLC	Yes
3215 Cushman Cir SW	230,730	5.30	160,588	139,412	RG-3-C	MDR	Ga Cap Cv Cushman 2019 LLC	Yes
1800 Memorial Dr SE	232,094	5.33	161,538	138,462	RG-3-C	MDR	Memorial Sbf LLC	Yes

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3707 Roswell Rd NE	237,397	5.45	165,229	134,771	RG-3	MDR	Rre Buckhead Holdings LLC	Yes
1829 Campbellton Rd SW	248,997	5.72	173,302	126,698	MR-3-C	MDR	Venetian Hills Apartments LLC	Yes
95 Peyton Rd SW	249,664	5.73	173,766	126,234	RG-3	MDR	First Khmer Holdings LLC	Yes
0 M L King Jr Dr SW	253,786	5.83	176,635	123,365	RG-3	MDR	Synergy Multifamily Capital	Yes
222 Tuskegee St SE	255,519	5.87	177,841	122,159	RG-3-C	MDR	Columbia at Peopletown LP	Yes
457 East Lake Blvd SE	263,913	6.06	183,683	116,317	RG-3-C	MDR	Atlanta Housing Authority	Yes
71 Howard St SE	266,932	6.13	185,785	114,215	MR-3-C	MDR	Kirkwood Partners LLC	Yes
745 Rosalia St SE	269,038	6.18	187,250	112,750	RG-3-C	MDR	Roosevelt Associates LLLP	Yes
2255 Lenox Rd NE	269,331	6.18	187,455	112,545	RG-3	MDR	Lenox Woods Properties I LP	Yes
0 Bolton Rd NW	273,914	6.29	190,644	109,356	MR-3	MDR	Reserve At Bolton Road LP The	Yes
0 Techwood Dr NW	286,465	6.58	199,380	100,620	RG-3	MDR	Atlanta Housing Authority	Yes
142 Georgia Ave SE	286,536	6.58	199,429	100,571	RG-3	MDR	Atlanta Housing Authority	Yes
999 Lee St SW	104,331	2.40	208,662	91,338	I-1	MUHD	Worldcom Network Services Inc	Yes
0 Pylant St NE	113,901	2.61	227,802	72,198	I-1	HDR	Doug Davis Family Limited Partnership LLLP	Yes