STATE & REGIONAL POLICY WHITE PAPER

Beyond the Blame Game

A collaborative housing continuum for Coastal Georgia and communities across the state

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Origin: Jacksonville University MPP / MDR Adaptation

Location: St. Marys, Georgia

Executive Summary: Georgia requires a unified, evidence-based housing strategy connecting the complete continuum of shelter: homelessness prevention, crisis accommodation, supportive housing, workforce rentals, Missing Middle typologies, and sustainable homeownership. Neither public regulators nor private developers control the total ecosystem. Progress demands an objective local fact base, cross-sector operational collaboration, and legally binding affordability safeguards.

SECTION 01

Policy Context: Moving from Impasse to Shared Accountability

Housing policy debates across Coastal Georgia frequently degenerate into an unproductive cycle of mutual blame. Merchant builders and residential developers emphasize that rigid low-density zoning codes, escalating municipal tap fees, and protracted entitlement timelines artificially restrict production. Conversely, local governments and civic groups point toward rising speculative land values, premium material selections, and an absence of attainable homes for the local workforce.

The Builder & Developer Perspective SUPPLY FRICTION

Asserts that excessive minimum lot sizes, parking mandates, and bureaucratic delays create significant carrying costs. Builders argue that to achieve viable risk-adjusted capital returns amid regulatory uncertainty, they are forced to build higher-margin luxury products.

The Municipal & Civic Perspective EQUITY & IMPACT

Contends that unregulated market development prioritizes high-end gated tracts that overburden municipal utilities, drainage, and schools without expanding attainable housing supply for local service workers, public safety personnel, and educators.

The Policy Objective: Overcome this adversarial posture by rigorously testing cost structures site by site. Policy analysis must delineate which regulatory or financing friction points determine feasibility, which stakeholder has authority to remediate them, and how public concessions directly protect resident affordability.

SECTION 02

Georgia Evidence: Establishing a Shared Empirical Baseline

Regional housing solutions cannot rely on generalized assumptions or statewide aggregates. The metrics below summarize verified benchmarks across Georgia and the coast, separating broad population growth from specific household affordability thresholds.

$1,393	$1,235	$1,135	+9.8%
GA MEDIAN RENT	CAMDEN MEDIAN RENT	GLYNN MEDIAN RENT	CAMDEN POP. GROWTH ('20-'25)

Indicator & Source	Empirical Data Point	Strategic Meaning for Leaders
Georgia Median Gross Rent ACS 2020–2024 (5-Yr)	**$1,393 / month** Requires $55,720 annual household income at the 30% cost-burden threshold.	Statewide baseline includes utilities. Does not reflect higher asking rents for newly constructed or newly listed units.
Coastal County Median Rents ACS 2020–2024 (5-Yr)	**Camden: $1,235 / mo** **Glynn: $1,135 / mo**	Countywide medians mask acute neighborhood-level deficits and shortages of housing affordable to entry-level local workers.
Population Expansion Census Estimates Base (2020–2025)	**Camden: +9.8%** **Georgia: +5.5%**	Camden County's growth substantially outpaces the state average, compounding demand on local infrastructure and services.
Historical Cost Burden GA DCA Assessment (2023 Release)	**43% of Renters burdened** **19% of Owners burdened** (2019 baseline)	Highlights structural vulnerability: renters experience more than double the cost burden of homeowners under baseline conditions.
Municipal Direct Capital City of Savannah FY2025 Budget	**$2.5M Affordable Housing Fund** adopted appropriation	Demonstrates dedicated local financing, but underscores that direct public funds must catalyze substantial private and CDFI leverage.

Rigorous Local Diagnostics Preceding Public Allocations

Before committing public land or tax expenditures, municipal coalitions across Chatham, Bryan, Liberty, McIntosh, Glynn, and Camden counties must construct local housing profiles. Assessments must integrate ACS/HUD data with live wage rates, emergency shelter turnaways, utility capacities, coastal flood exposures, and insurance availability. One jurisdiction's findings must not be treated as a uniform regional blueprint.

SECTION 03

Housing as an Integrated Continuum & Coastal Economics

A housing continuum provides a complete portfolio of interdependent choices, not a rigid ladder requiring progression from shelter to homeownership. The goal is safe, accessible housing aligned with actual income.



FIGURE 1: HOUSING CONTINUUM CONTINUUM ARCHITECTURE & LAYERED CAPITAL STACK

Continuum Tier	Core Housing Delivery Strategy	Accountability & Retention Standard
Loss Prevention & Safety	Rental arrears relief, emergency health repairs, and low-barrier shelter.	Household stability at 12 mos; documented reduction in crisis turnaways.
Supportive Housing	Permanent supportive housing (PSH) combining rental subsidies with health services.	90%+ long-term housing retention; voluntary service engagement.
Affordable Rental Choices	Naturally Occurring Affordable Housing (NOAH) preservation and voucher programs.	Gross rent capped at ≤30% household income; zero involuntary tenant displacement.
Missing Middle & Infill	Duplexes, quadplexes, cottage courts, and modular neighborhood infill.	Delivered cost per heated sq ft; long-term affordability covenants.

Empirical Grounding: Coastal Hazards & Total Cost Capitalization: Coastal site evaluation must account for environmental risks. Empirical research confirms that flood zone classifications and risk-adjusted insurance premiums directly capitalize into property values and long-term costs (Bin et al., 2008; Kousky et al., 2020). Developing inexpensive outlying parcels with high flood risk or volatile wind insurance creates structural delinquency hazards for lower-income households.

SECTION 04

Missing Middle Typologies & Off-Site Construction Economics

Missing Middle Housing—coined by Daniel Parolek and Opticos Design—describes house-scale, multi-unit building types in walkable contexts. The "middle" denotes *form and scale*, not income eligibility. Affordability is not inherent in architectural typology; it must be intentionally engineered through land efficiency, competitive delivery, and deed-restricted public covenants.

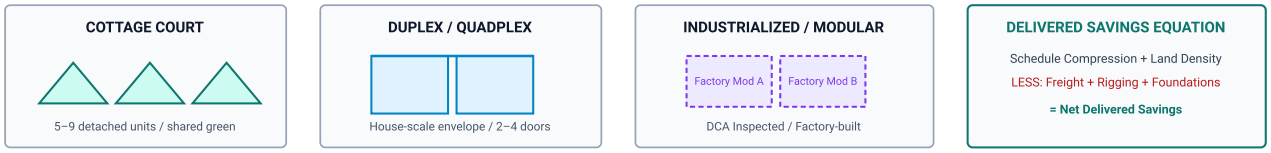


FIGURE 2: MISSING MIDDLE TYPOLOGY ENVELOPES & INDUSTRIALIZED CONSTRUCTION ECONOMICS

Georgia Industrialized Building Rules

DCA's Industrialized Buildings Program inspects factory-built modules for statewide building code compliance. However, **local jurisdictions maintain statutory authority** over zoning classifications, setbacks, lot coverage, foundations, utility taps, and aesthetic design. Off-site construction shortens delivery schedules but does not circumvent municipal site plan approval.

Empirical Incentive Design (Inclusionary Overlays)

Evaluating tools like Savannah's Affordable Housing Overlay requires grounded economics. Wang & Fu (2022) found that voluntary density bonuses and clear regulatory offsets generate below-market homes without depressing overall market supply. Inflexible mandates lacking financial incentives risk acting as a development tax that suppresses housing starts.

Empirical Validation of Industrialized Speed: Economic evaluations of modular construction reveal that primary cost reductions stem from 20% to 50% schedule compression. Concurrently fabricating modules off-site while preparing foundations on-site reduces developer interest-carry periods and shortens debt-service cycles, rather than providing guaranteed material discounts. Local pilots must evaluate fully installed turnkey bids against conventional construction.

SECTION 05

Cross-Sector Collaboration: The GICH Paradigm & Stakeholder Matrix

Housing solutions require interdisciplinary structure. The Georgia Initiative for Community Housing (GICH)—co-sponsored by DCA, UGA, and the Georgia Municipal Association—proves that a structured, three-year technical framework builds the institutional trust needed to implement durable housing plans.

Stakeholder Sector	Core Operational Responsibility	Actionable Deliverable
Municipalities & Counties	Inventory surplus public parcels; streamline entitlement calendars; assess utility extensions.	Published municipal land bank; 45-day review track for workforce infill.
Builders & Modular Fabricators	Submit transparent, open-book cost estimates; disclose supply-chain assumptions.	Guaranteed Maximum Price (GMP) bids tied to long-term affordability terms.
Commercial Lenders & CDFIs	Provide low-cost construction lines and structured secondary market takeouts.	Dedicated revolving credit facility with flexible debt-service terms.
Employers & Port Authorities	Quantify wage tiers and commuting bottlenecks; explore employer-assisted housing.	Direct equity grants, down-payment loan guarantees, or master-lease support.
Housing Trusts & Service Providers	Manage intake, income certifications, permanent supportive housing, and land trusts.	99-year ground lease covenants; anti-displacement case management.
Real Estate Professionals & Boards	Complete training on deed covenants; educate buyers on shared-equity models; market attainable stock.	Certified Ambassador roster; flat-fee transaction schedules for restricted units.
Civic & Neighborhood Leaders	Guide context-sensitive infill design, accessibility audits, and lived-experience input.	Community advisory sign-off; neighborhood integration scorecards.
DCA & Regional Commissions	Provide technical assistance, environmental screening, and infrastructure matching grants.	Inter-county infrastructure alignment and grant management.

Operational Integration: Certified Real Estate Ambassador Program

Real estate agents represent a key retail interface with prospective homebuyers. While conventional percentage-based commissions disincentivize agents from selling lower-cost attainable homes, a **Certified Attainable Housing Ambassador Program** turns agents into vital program navigators. Participating agents receive specialized training on DCA financing, community land trust resale covenants, and local down-payment assistance. In return for priority referrals, certified agents adopt flat-fee transaction schedules, reducing transaction friction while providing professional homeownership counseling.

SECTION 06

Public Finance: Purchasing Measurable Community Value

Public subsidies must purchase enduring community utility rather than uncaptured developer profits. A disciplined pilot strictly segregates *revolving construction capital* from *nonrecoverable household grants*, ensuring transparent loan servicing, default reserves, and ongoing deed-compliance monitoring.



FIGURE 3: SEGREGATED PILOT CAPITAL STRUCTURE & COMPLIANCE ARCHITECTURE

Financial Tool	Primary Economic Contribution	Underwriting Limit & Safeguard
DCA Rural Workforce Housing	Finances municipal infrastructure (roads, water/sewer) serving workforce parcels.	Competitive NOFA cycles; requires verified net savings passed to end-users.
Public Land Donation	Eliminates land acquisition costs; unlocks suitable urban infill sites.	Requires reverter clauses if construction is delayed past 18 months.
Municipal Fee Waivers	Reduces upfront carrying costs prior to construction financing close.	Must evaluate utility enterprise fund health to prevent municipal operating deficits.
Shared-Equity Resale Caps	Preserves public subsidy across 30–99 years, maintaining workforce affordability.	Requires active land trust oversight and clear index appreciation formulas.
Transaction Fee Caps	Engages private brokerage networks to market and close attainable homes.	Caps broker compensation paid from public subsidy funds to flat-fee rates.

Fiscal Safeguard: Avoiding Double-Counted Social Benefits

Cost-benefit analyses must carefully distinguish developer production savings from household social benefits. Conflating expanded developer profit margins with reduced resident cost burdens constitutes double-counting. Additionally, projected municipal tax revenues from new infill development must be netted against the ongoing public cost of providing water, emergency services, and roadway maintenance.

SECTION 07

Recommendations & Implementation Roadmap

A phased 24-month implementation roadmap moves the Coastal Georgia Housing Partnership from intergovernmental agreement to project delivery and longitudinal evaluation.

1. **Months 1–3: Consolidated Housing Needs Assessment.** Form a joint housing task force to compile ACS, HUD, eviction, and homeless management data across county lines. Identify immediate service gaps and establish area median income baselines.
2. **Months 3–6: Site Screening & Partnership Compact.** Adopt the formal Intergovernmental Agreement. Audit surplus public parcels, screen against 100-year coastal flood zones, verify utility capacities, and establish expedited 45-day review pathways.
3. **Months 6–9: Dual-Track Competitive RFP.** Issue an open procurement for a 10–20 unit pilot across participating jurisdictions. Solicit comparative bids from both modular and conventional site-builders to objectively evaluate all-in turnkey costs.
4. **Months 9–18: Capital Deployment & Construction.** Disburse construction financing from Account A; allocate Account B affordability grants; activate the Certified Real Estate Ambassador network; and record 30-year deed covenants upon certificate of occupancy.
5. **Months 18–24: Longitudinal Audit & Program Scaling.** Audit true utility expenditures, actual insurance premiums, loan repayment performance, and tenant housing stability. Scale production only if verified metrics meet affordability standards.

EXECUTIVE PERFORMANCE DASHBOARD

Performance Metric	Evaluation Standard & Verification Protocol	Accountable Lead
Continuum Production	Net units created/preserved by AMI category (<30%, 30–60%, 60–80%, 80–120%).	Housing Coordinator
Review & Permitting Velocity	Calendar days from complete application submission to building permit issuance.	Planning Director
Delivered Fiscal Efficiency	Average public subsidy per unit; loan default rates; capital recycling timeline.	Finance Director / CDFI
Household Cost Stability	Total housing costs (rent/mortgage + utilities + insurance) under 30% of income.	Community Housing Trust
Brokerage Compliance	Share of pilot units closed via flat-fee schedule and certified ambassador program.	Board of Realtors Liaison

SECTION 08

Analytical Boundaries & Scholarly Foundations

This white paper provides a structured policy synthesis for regional leaders, municipal officials, and community practitioners. In accordance with rigorous public policy conventions, its scope, analytical boundaries, and scholarly lineage are detailed below.

Scope & Disclaimers: This document represents policy analysis, not a certified structural design, environmental audit, or formal legal opinion. ACS five-year estimates describe sample averages carrying margins of error, not live asking rents. The 30% cost-burden ratio is an analytical planning convention, not a commercial lending mandate. Florida statutory citations, fast-track permitting mandates, and theoretical benefit-cost ratios from prior coursework are excluded as established Georgia law.

Scholarly & Institutional Lineage

Adapted from Jacksonville University MPP coursework by Lisa James, MPP (PPOL 502, *Modular Density & Resilience*; PPOL 501, *Welcome Home? Solving Housing Affordability*). Informed by collaborative research with K. Anderson, B. Hickey, T. Sweat, and K. Choo. Recommendations here represent independent LMJ adaptations and do not imply institutional endorsement.

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DOCUMENTED AUTHORITIES & EMPIRICAL REFERENCES

• **U.S. Census Bureau:** ACS 2020–2024 & V2025 Estimates for Georgia, Camden, & Glynn.

• **City of Savannah:** FY2025 Adopted Budget; Affordable Housing Fund & Housing Overlay.

• **Opticos Design:** Daniel Parolek, *Missing Middle Housing* (2010/2020).

• **Bin, O., Kruse, J. B., & Landry, C. E. (2008):** Flood hazards, insurance rates, and amenities. *J. Risk & Ins.*, 75(1).

• **Wang, R., & Fu, X. (2022):** Policy design under inclusionary zoning. *J. Am. Planning Assoc.*, 88(4).

• **Georgia DCA:** Housing Needs Assessment (Nov 2023 release; 2019 baseline cost burden).

• **Georgia DCA:** Industrialized Buildings Rules; GA Initiative for Community Housing (GICH).

• **Georgia DCA:** Rural Workforce Housing Initiative (RWHI) Notice of Funding Availability (May 2025).

• **Kousky, C., et al. (2020):** Flood risk and the U.S. housing market. *J. Housing Research*, 29(sup1).

• **Washington, E. (2019):** Inclusionary zoning and housing market outcomes. *SSRN Electronic Journal*.