

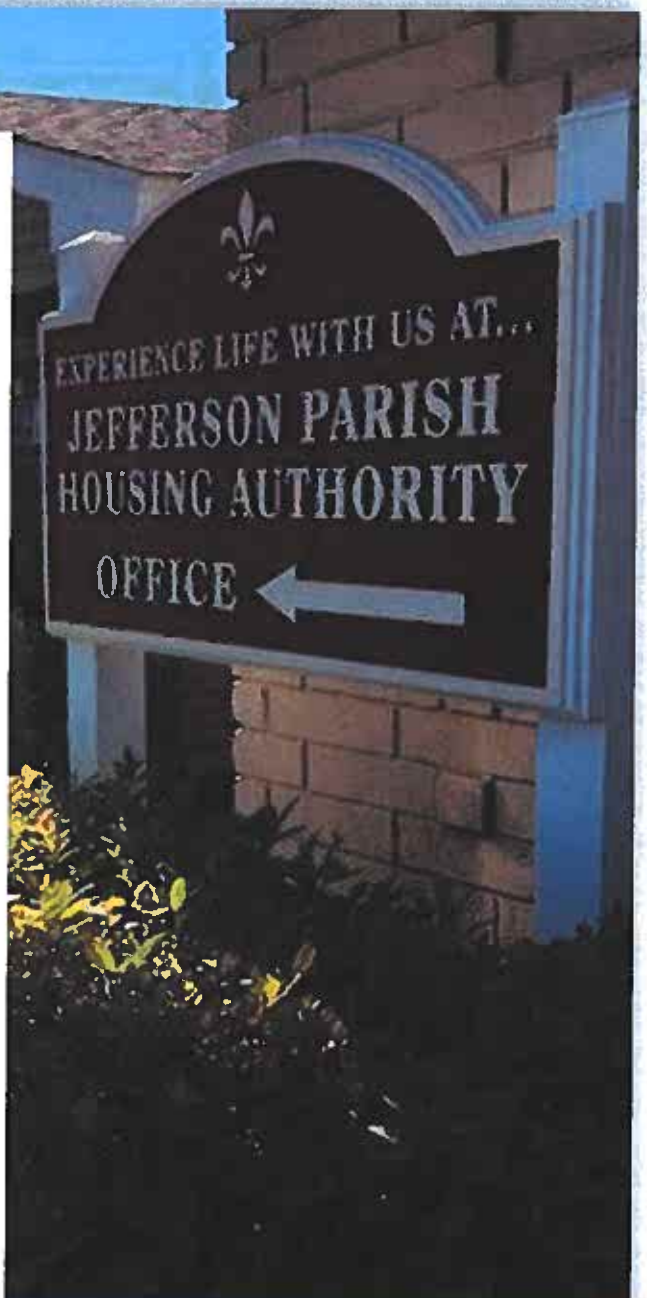
Conversion Plan 2020

Moving Forward Together

JUNE 2020



*Housing Authority
of
Jefferson Parish*



Introduction

In order to secure and receive federal funding to operate the public housing development known as the Acre Road Project in Marrero, Louisiana, the Housing Authority of Jefferson Parish (HAJP) executes an Annual Contributions Contract (ACC) with the Department of Housing and Urban Development (HUD) annually. Pursuant to the ACC, the HAJP has a duty to ensure it cooperates with HUD to fulfill its mission, as it is defined in the ACC.

Significant laws were passed between 1986 and 2011 that gave PHAs across the country an indication of the direction the country will be taking in continuing to ensure low income families receive affordable housing assistance that is decent, safe, and sanitary. The HAJP is ready, willing, and able to ensure it does what is expected to ensure it cooperates with HUD to help the public housing residents of the HAJP's Acre Road Project receive decent, safe, and sanitary housing using all viable options authorized by regulations. Table 1 below outlines the significant laws and studies regarding public housing.

TABLE 1.

Significant Laws and Studies Regarding Public Housing

Timeframe	Action
October 22, 1986	President Ronald Reagan signed the <i>Tax Reform Act of 1986</i> into law. The Low-Income Housing Tax Credit Program began with the enactment of that law.
October 21, 1998	President William Clinton signed the <i>Quality Housing and Work Responsibility Act (QHWRA of 1998)</i> into law. It amended <i>United States Housing Act of 1937</i> . Section 9(g)(3) of the Housing Act of 1937 ("Faircloth Amendment") limits the construction of new public housing units. Section 18 (Demolition and Disposition of Public Housing), Section 22 (Authority to Convert Public Housing to Vouchers), Section 32 (Homeownership), Section 33 (Required Conversion of Distressed Public Housing to Tenant-Based Assistance), and Section 35 (Mixed Finance Public Housing) are included.
June 6, 2003	Final Report, Public Housing Operating Cost Study
November 24, 2010	Capital Needs in the Public Housing Program Revised Final Report
November 18, 2011	President Barack Obama signed the <i>Consolidated and Further Continuing Appropriations Act of 2012</i> into law. The Rental Assistance Demonstration (RAD) began with the enactment of that law.

Justification for Streamlined Voluntary Conversion

The HAJP has decided that Streamlined Voluntary Conversion (SVC) is the appropriate option for future growth as it has decided to not continue to operate the Acre Road Project as rental housing. This will allow the HAJP to move from administering two programs (Public and Indian Housing Program and Public Housing Capital Fund Program) to one program (Section 8 Housing Choice Vouchers (HCV) Program). Moving from administering two separate programs to a single HCV program will serve to reduce the HAJP's administrative burden because it will no longer have to comply with two different programs' regulations. Therefore, the conversion of the public housing into tenant-based vouchers for the tenants who qualify is the best viable option in order for the HAJP to continue to provide residents who reside in the project with comparable housing.

“Change is inevitable. Growth is optional.”

John Maxwell

SVC will also serve to give the residents of the Acre Road Project more options in terms of housing choices. The houses in the Acre Road Project were built in the mid-to-late 60's and have reached a point where the structures will require significant remodeling and reconstruction if they are to continue to be inhabited. The continued use of federal monies to repair these structures when the funds could be used to not only provide assistance for housing, but also allow the recipient a choice in neighborhood and location of housing, is a wasted investment. The HAJP seeks to fulfill its mandate to provide safe, clean and affordable housing by transitioning the tenants at the Acre Road Project to Tenant Protection Vouchers and assisting these tenants in securing safe and affordable housing of their own choice.

Funding Concerns

On November 7, 2015, The Nelrod Company, completed a Green Physical Needs Assessment (GPNA) for the HAJP's public housing project. Table 2 shows the results of the GPNA.

TABLE 2.

Category	Immediate Repairs	Years 1-5	Years 6-10	Years 11-15	Years 16-20	Total	Per Unit Cost
Site	\$709,870.29	\$17,976.38	\$566,600.57	\$17,976.38	\$102,817.95	\$1,415,241.57	\$7,076
Building Exterior	\$44,045.88	\$238,150	\$924,961.88	\$1,327,918.99	\$899,260.57	\$3,434,337.31	\$17,172
Building Systems	\$193,745.24	\$0	\$0	\$0	\$0	\$193,745.24	\$969
Common Areas	\$2,305.76	\$2,756.89	\$1,753.85	\$7,766.70	\$29,799.21	\$44,382.21	\$222
Unit	\$501,545.78	\$3,679,378.89	\$1,677,280.48	\$4809,406.00	\$1,476,892.68	\$8,144,503.83	\$40,722
Total Preliminary Estimated Cost	\$1,451,512.94	\$3,938,262.17	\$2,163,068.08	\$2,508,770.40	\$13,232,210.17	\$21,393,824	\$106,969

The HAJP reported it earned \$530,959 in Total Tenant Revenue during its FYE September 30, 2019. It was awarded \$671,188 in Operating Subsidy for Calendar Year (CY) 2019, and a \$419,038 in Public Housing Capital Fund grant for Federal Fiscal Year (FFY) 2019. Those funds combined are \$1,621,185.

However, in order to access these funds, the administrative staff must go through a process which requires an extensive amount of time and effort compared to the Housing Assistance Payments (HAP) funding and Administrative Fee funding process. The HAJP earns Administrative Fee funding to administer the program and pay the operating expenses it incurs within its Section 8 Housing Choice Vouchers Program.

The HAJP tends to use its Public Housing Operating Subsidy and Capital Fund Program funds for Operational Needs due to the fact that the majority of the expenses the project incurs are for non-capitalized expenses. If converted, however, the HAP funding that the HAJP would earn in place of the Public Housing Operating Subsidy and Capital Funds would be utilized to help pay a portion of the rent at properties for which the former public housing project's resident choose to live. Those HAP funds would be used by the property owners to pay their properties' operating expenses, which they will continue to receive as long as the voucher participants have a lease. In general, private property owners will be more able to tap into resources to fund their properties' capital needs because they have a for-profit incentive to ensure their properties make a profit. In this manner, the HAJP will be relieved of the ever-present concern regarding having enough funding to support its public housing project's capital needs.

DRAFT

PHA Plan Update

PHA Annual Plan Amendment

The PHA Plan must comply with all applicable requirements specified in Notice PIH 2019-05 (as applicable) and in Notice PIH 2015-18 regarding PHA Plan requirements.

The HAJP has amended its Public Housing Agency (PHA) Annual Plan to include Streamlined Voluntary Conversion for all inhabited public housing units in the Acre Road Development.

Pursuant to the waivers allowed under Notice PIH 2020-05, a notice announcing the significant amendment of Streamlined Voluntary Conversion to the HAJP PHA Annual Plan will be publicized on the HAJP's website and written notice will be provided to all of the residents on 5/8 by placing written notice in the mail slots of the residences. The written notices will explain the process, provide a timeline for the conversion process and provide a contact number and email for any questions.

Resident Involvement

Public Hearings/Roundtable Discussion

The HAJP began holding hearings with the residents of the Acre Road Project in late January of 2020 regarding the move to Streamlined Voluntary Conversion as shown in Table 3.

TABLE 3.

Date	Description of Meeting
January 27, 2020	Public Meeting with Residents
March 10, 2020	Public Meeting with Residents and Councilman for District 3

With the onset of the Coronavirus, public hearings for the residents on streamlined voluntary conversion have been placed on hold for a short period of time. This Draft Conversion Plan will be posted on the HAJP website and notice of the plan will be provided to all residents to encourage resident participation in the drafting of this plan. The HAJP has set up an email account specifically for resident feedback and questions regarding this plan and the streamlined voluntary conversion process. The HAJP is also working to set up an online format allowing for a town hall type meeting.

Board Approval

TBD

The HAJP is working to schedule a teleconference meeting of the HAJP Board of Commissioners for review and approval of the Conversion Plan.

Local Government Review

Consistency with Consolidated Plan for the Jefferson HOME Consortium

The 2018-2022 Consolidated Plan for the Jefferson Home Consortium (“Consolidated Plan”) is part of the Jefferson Parish Comprehensive Plan. The Jefferson Home Consortium was created under HUD’s HOME Investments Partnerships and includes Jefferson Parish, the City of Kenner and St. Charles Parish. The primary objective of the Consolidated Plan is to maximize limited public resources by acting as a catalyst to attract private and other resources to address the affordable housing, public service, infrastructure and other needs of this area. The primary outcome of the Consolidated Plan is to improve the quality of life for the people of Jefferson Parish and particularly those of low to moderate income.

The Consolidated Plan documents that the most common housing problem for Jefferson Parish is housing cost burden greater than 50% of income for both renters and owners. Additionally, the Consolidated Plan noted that 71% of rental units for this area are 2 bedroom or less – making it difficult for large families to find a rental unit large enough to accommodate the family members. Table 4 sets forth certain objectives of the Consolidated Plan which this Conversion Plan will help to achieve.

Table 4.

Objectives of the Consolidated Plan include:	
1.	Reduce the isolation of low income groups within the communities and geographical areas by revitalizing deteriorating neighborhoods.
2.	Maintain and increase the quality of housing available to lower-income Consortium residents.
3.	Alleviate physical and economic distress through the stimulation of private investment and the provision of employment opportunities, in conjunction with other agencies and the private sector.

Pursuant to the Consolidated Plan, the New Orleans-Metairie Metropolitan area has less than the national level of affordable and available units per 100 households at or below the extremely low income (ELI) threshold. Source: The GAP: A Shortage of Affordable Homes, National Housing Coalition (March 2017). Moreover, the New Orleans-Metairie Metropolitan Area has a deficit of approximately 40,000 affordable and available units for extremely low income households. This area also has a shortage of almost 50,000 units at or below 50% of Area Mean Income (AMI). Finally, the percentage of affordable units per 100 households available are at 30% of ELI and 50% of AMI respectively.

Under this Conversion Plan, the 18 acres which once held the Acre Road Public Housing Development will be redeveloped with a mix of affordable and market rate housing and low density commercial uses. The demolition of the public housing development and transition of the tenants from public housing to housing choice vouchers will satisfy Objective No. 1 by reducing the isolation of this low income group and acting as the catalyst for the revitalization of this neighborhood.

The redevelopment of this property will satisfy Objective No.'s 2 and 3 by increasing the quality of housing available and stimulating private investment in an effort to alleviate the physical and economic distress in this area.

This Conversion Plan will be provided to the Jefferson Parish Council for review and certification of consistency with the Jefferson Parish Comprehensive Plan at the May 13, 2020 meeting.

Future Use

24 CFR 972.230(a)

The planned future use for the residences and land which comprise the Acre Road Project is demolition of the units and a sale of the property. The property will not continue to operate as rental housing. This disposition will principally benefit the residents and the community as the funds received from said disposition will be used to fund efforts to support local, minority owned businesses in this area and to fund a continued effort on the part of Jefferson Parish to provide training and assistance for those residents of the Acre Road Project who wish to use their voucher as a means to purchase a home.

Environmental Review

24 CFR Part 58

The HAJP is working with HUD to determine the appropriate Responsible Entity (“RE”) to perform the required environmental review under 24 CFR Part 58. The Jefferson Parish Community Development Department is unable to undertake a review of this magnitude as it does not have sufficient resources for this level of review.

Following the designation of an RE for this project, the HAJP will work hand-in-hand with the RE to ensure that the environmental review is completed timely in order to allow for this process to move forward as planned.

Impact Analysis

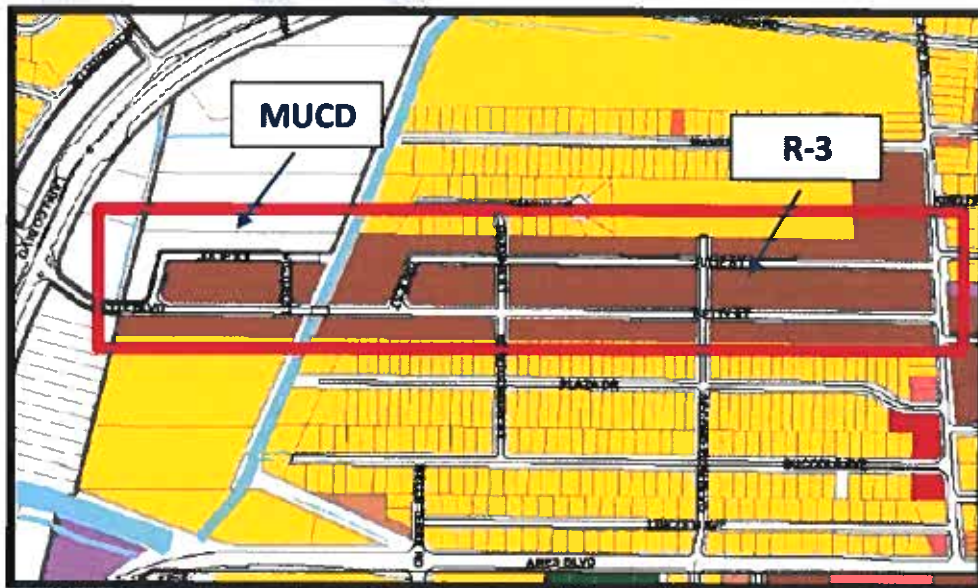
Impact on Neighborhood and Other Elements

The goal for the Acre Road Project property is to demolish the existing housing units and then transfer the property to a third-party developer. Jefferson Parish will work with the developer to develop a mixed-use development including affordable housing to reinvigorate this area. The conversion of the existing dated housing stock to a new, mixed-use development with affordable housing will positively impact the neighborhood surrounding the Acre Road Project by bringing in low-density commercial uses which complement those uses already present in the neighborhood, in addition to new, affordable housing.

Neighborhood Impact

The neighborhood surrounding the Acre Road Project is a mix of single-family residential, multi-family residential and smaller commercial uses with the predominant use being single-family residential. The property runs from Acre Road, stopping short of fronting on Lapalco Blvd., and encompasses approximately 18 acres. The majority of the property is zoned R-3, Multi-family Residential with a small portion close to Lapalco Blvd. being zoned MUCD, Mixed-Use Corridor Development.

Figure 1. Zoning of Acre Road Project Neighborhood

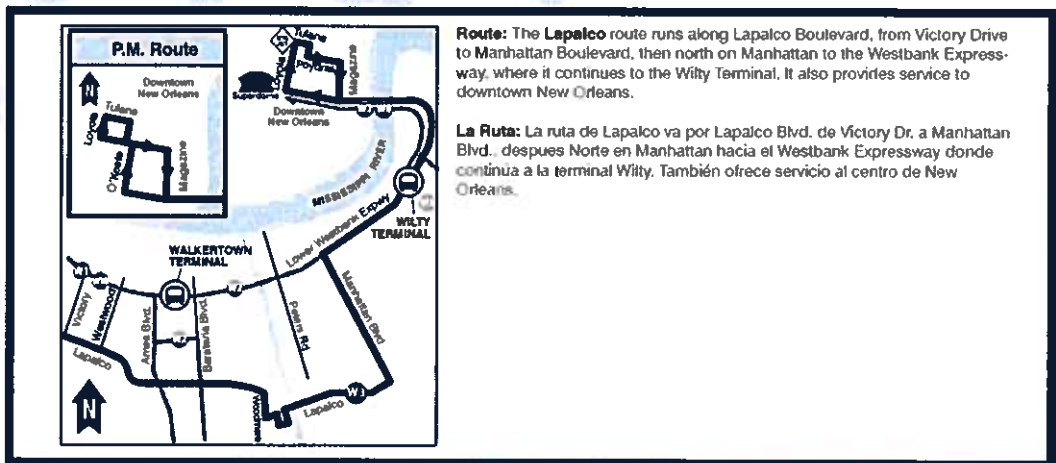


To the east of the Acre Road Project – running from Betty St. to Ames. Blvd. is developed mainly with single-family housing that is majority owner-occupied. To the west of the Acre Road Project – running from Julie St. to Mansfield Dr. is a mix of single-family, two-family and religious uses. Fronting along Acre Rd. and Ames Blvd. is a mix of single-family, two-family, multi-family and low-density commercial uses. The development of the area is mixed-use, but is majority residential. As such, the development of affordable housing ranging from two-family to low-density multi-family, within this area is both appropriate for the uses in this area and necessary to increase the stock of affordable housing on the West Bank of Jefferson Parish.

The location of the property off of Lapalco Blvd. lends itself to commercial development closer to Lapalco Blvd. with low-density commercial appropriately placed within the development along Betty St. Moreover, Jefferson Transit runs a bus route along Lapalco Blvd. from Victory Dr. to Manhattan Blvd. and continuing on into Downtown New Orleans via the Westbank Expwy.

allowing for direct access to downtown New Orleans on public transit from this area.

Figure 3. Jefferson Transit Lapalco Blvd. Route



The R-3 zoning allows for a range of

residential uses from two-family to multi-family and for compatible non-residential uses such as daycares, hair care services and community centers. (Chapter 40, Jefferson Parish Code of Ordinances). Currently the entirety of the property is developed with 200 duplexes and small play areas. The zoning in this area would allow for a mix of residential uses in a greater density than that which the current utilization of the property provides;

thereby allowing for an increase in affordable housing potentially including both renter- and owner-occupied.

The development of new, affordable housing and low-density commercial uses in this area will serve to increase the stock of affordable housing for Jefferson Parish as the redevelopment of the Acre Road Project will allow for a greater density of residential uses than what is currently existing on site.

Impact on Affordable Housing

Currently, the Acre Road Project consists of 100 duplexes with units ranging in size from one bedroom to four bedrooms set forth in Table 4. The majority of the units (170 units) are two and three bedrooms. As such, the density of the residential uses is minimal compared to what the zoning of the property allows.

TABLE 5.

Type of Residential Structure	Number of Bedrooms	Number of Units in Development
Duplex	1	22
Duplex	2	80
Duplex	3	90
Duplex	4	8
Total:		200 Units

Relocation Activities

Moving Forward

Persons living in the Acre Road Public Housing Development as of January 1, 2020, who are in “good standing” and who do not qualify as over-income will be given the option to relocate using a tenant protection voucher (TPV). The tenant protection voucher will allow for 60 days in which the resident must find suitable housing. However, the HAJP may extend this timeframe for an additional 60 days if the circumstances warrant it.

For purposes of this section, “Good standing” is defined as follows:

1. A resident who is current on rent, and not delinquent in any manner concerning payments to the HAJP or another Housing Authority and not in violation of their lease such that eviction procedures have begun or can begin.
2. A resident who does not qualify as over-income.

Please note that, although all tenants were previously receiving public housing assistance, the HAJP must still screen families for TPV eligibility consistent with the requirements in 24 CFR part 982. The information and documentation required for this screening will be provided separately. Housing counselors will be made available to assist with completing the necessary documentation and answering all questions.

Over-Income Families

Tenant Families who qualify as over-income will not be provided a TPV, however, the HAJP is required to locate comparable housing for these tenants.

Comparable housing is housing of a similar size and nature which does not exceed 30% of the family’s income. The HAJP may be able to assist in rental payments if it is unable to locate comparable housing. Relocation expenses will be provided for within budgetary limits.

Relocation costs and expenses

Relocation costs and expenses will include payment of actual, reasonable moving costs and expenses as set forth below and in line with the Relocation Budget. Both relocation

expenses and TPVs will be provided to the tenants in phases in order to allow staff sufficient time to address the needs and concerns of all tenants affected. A phasing schedule will be provided within the month.

HJAP will survey residents before relocation to determine housing needs and preferences, and any special needs of family such as those for elderly or handicapped.

Cost and Expenses:

1. The HJAP will not undertake the move itself, nor use force labor or its own employees. It will provide funds, according to the payment schedule in Table 6 for the tenants to hire a moving company or pay someone at his/her own discretion.
2. Tenants will receive an expense and dislocation allowance determined according to the payment schedule in Table 6. Tenants must return any unspent portion of the allowance along with supporting documents, i.e., receipts, invoices, etc. to the HJAP. Any funds not supported with documentation will be required to be returned to the HJAP.
3. Moving Related Supplies - It is the tenant's responsibility to do their own packing, etc.

Table. 6. Payment Schedule

Moving Expenses	Maximum Amounts
Bedroom Size	
1 Bedroom	\$1,000.00
2 Bedroom	\$1,200.00
3 Bedroom	\$1,500.00
4 Bedroom	\$1,700.00
Telephone Transfer Fee	\$100.00
Gas Deposit	\$150.00
Electric Deposit	\$150.00
Water Deposit	\$100.00

Relocation Process:

All tenants will be assigned a housing counselor who will assist them in the process of both documentation and relocation. Questions concerning eligibility and the amount of rent for which a tenant will qualify will be addressed by their assigned housing counselor. The TPVs allow for a period of 60 days to locate housing which is compliant with HUD regulations. However, an extension of 60 days may be allowed if circumstances support the extension and are properly documented.

The HAJP will schedule a Landlord Fair, if and when circumstances surrounding COVID-19 allow for such. However, Nan McKay, the third-party contractor who manages the Housing Choice Voucher (Section 8) program for the HAJP, has a Landlord Listing for all landlords with Section 8 properties.

Close-Out Information

Notification of Public Housing
Closeout or Future Development
HUD-5837

U.S. Department of Housing
and Urban Development
Office of Public and Indian Housing

OMB Approval No. 2577-0075
(exp. 01/31/2021)

The information collection requirements contained in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2577-0075. There is no personal information contained in this application. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when disclosure is not required. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

This information is designed to supplement the HUD-52860 or RAD Application (both through the EMS/PIC application submission) for all inventory removal actions that will result in the removal of all ACC units from a Public Housing Authority's (PHA) inventory. HUD will use this information to provide targeted technical assistance, to identify potential issues, and to assess risk areas. Please refer to the instructions for guidance on completing this form. The information requested does not lend itself to confidentiality.

A. General PHA Information

PHA Identification Number and Name:	LA 013 Housing Authority of Jefferson Parish
PHA Fiscal Year End:	09/30/2020
Expected date of removal of last ACC unit:	12/15/2020
Does the PHA intend to closeout its public housing program or develop new ACC units in the future?	<input checked="" type="checkbox"/> Closeout public housing program Fill out Section B & D only <input type="checkbox"/> Develop new ACC Units Fill out Section C & D only

B. Public Housing Program Closeout Information

Does the PHA intend to closeout its public housing program through Consolidation/Voluntary Transfer as specified in Notice PIH 2014-24 (or subsequent guidance) or through ACC termination as specified in Notice PIH 2019-13?	<input type="checkbox"/> Consolidation/Voluntary Transfer (name of Receiving PHA if Transfer) <input checked="" type="checkbox"/> ACC Termination
Will the PHA have any Non-Dwelling Public Housing Real Property after it removes its last public housing unit? If yes, which removal action does the PHA intend to pursue to dispose of the remaining Public Housing Real Property?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Section 18 Application <input type="checkbox"/> Retain under 2 CFR part 200.311 <input checked="" type="checkbox"/> Transfer to 3rd Party <input type="checkbox"/> Other <input type="checkbox"/> No
Does the PHA have (or reasonably anticipate) any outstanding public housing litigation, claims, compliance reviews, monitoring reviews, PHA or MTW Plan reviews, audit, and/or fair housing or other civil rights complaints to resolve?	<input type="checkbox"/> Yes - explain in Section D <input checked="" type="checkbox"/> No
Will the PHA comply with all applicable required closeout activities specified in Notice PIH 2019-13?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If the PHA is eligible to receive Demolition and Disposition Transition Funding (DDTF) under 24 CFR 905.400(j)(4)(i), or Asset Repositioning Fee (ARF) under 24 CFR 990.190, does the PHA have any eligible uses of the such funds (i.e. close-out activities, MTW activities) after it removes all of its public housing units? *Note that if the PHA is closing-out through Notice PIH 2014-24 (or subsequent guidance), HUD will automatically fund DDTF and ARF so that the funds can be provided to the new or receiving PHA	<input type="checkbox"/> Yes - explain in Section D <input checked="" type="checkbox"/> No - the submission of this form constitutes the PHA's written rejection of DDTF in accordance with 24 CFR 905.400(j)(4)(i) and HUD will stop providing Operating Funds (including ARF) the funding cycle after the PHA removes the last of its public housing units

C. Future Development Information

How many new ACC units does the PHA intend to develop?	
Does the PHA have sufficient Faircloth limit authority to develop new ACC units? See Notice PIH 2011-69 (or subsequent guidance)	<input type="checkbox"/> Yes <input type="checkbox"/> No
What is the PHA's proposed development method?	<input type="checkbox"/> Conventional

	<input type="checkbox"/> Turnkey <input type="checkbox"/> Acquisition With or Without Rehabilitation <input type="checkbox"/> Force Account Labor <input type="checkbox"/> Mixed-Finance <input type="checkbox"/> Other Methods
Does the PHA have a site(s) selected?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Anticipated date of development proposal submission:	

D. Identify any potential issues related to closeout or future development activities.

<p>The only foreseeable potential issue related to the closeout is the environmental assessment as it relates to the sewer lift station on Lapalco Blvd. at the rear of the property.</p>	
<p>I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.</p> <p>Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012, 31 U.S.C. 3729, 3802)</p>	
Name of Authorized Official	
Title	
Signature	
Date	

Civil Rights Requirements

Compliance and Further Action

The HAJP certifies compliance with all applicable civil rights nondiscrimination and equal opportunity requirements, including, but not limited to, Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing. Moreover the HAJP also certifies that subsequent implementation of the approved conversion will comply with all applicable civil rights requirements, including conditions imposed in an environmental review to address environmental justice concerns.