




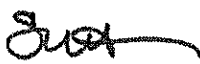
U. S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity
Five Points Plaza
40 Marietta Street
Atlanta, Georgia 30303-2806
(<http://www.hud.gov>)

June 14, 2017

MEMORANDUM FOR: Sunny Grover, Chicago Public and Indian Housing, Special Applications Center (SAC), PIA

FROM: Carlos Osegueda, Director, Region IV Director, Office of Fair Housing and Equal Opportunity, 4AEH

THROUGH: 
Marilyn Moore-Lemons, Acting Region IV, Program and Compliance Director, 4GES

THROUGH: 
Staci Gilliam, Director, Programs and Compliance for Alabama and Georgia 4CES

SUBJECT: Review of Disposition Application Request, East Point Housing Authority GA078000001 HILLCREST HOMES
Processor: SAC – Chicago

The Office of Fair Housing and Equal Opportunity (FHEO), Program and Compliance Division, has reviewed the above referenced Demolition Application (Demo) in accordance with HUD regulations at 24 CFR 970. The demolition of public housing is authorized under Section 18 of the Housing Act of 1937, as amended. FHEO recommends approval of the demolition application based on the following information.

Background

The East Point Housing Authority (EPHA) has requested to demolish two (2) buildings consisting of 100 obsolete public housing units located at Hillcrest Homes in East Point, Georgia. According to the information presented, no residents currently reside at the subject property. The EPHA cited community safety and health hazards as the primary reasons for the proposed demolition. Specifically, the buildings were constructed in 1951 and have been vacant since 2010. The buildings are severely vandalized, distressed, and are in disrepair. The EPHA asserts that demolishing these buildings will allow the agency to build 300 new, amenity-filled, affordable housing units in two phases. The proposed demolition will cost EPHA an estimated \$775,000.

Recommendation

FHEO recommends approval of the disposition application based on the following factors:

1. The EPHA will provide future residents units with greater amenities than the subject property, including: on-site laundry, energy efficient appliances, ceiling fans, recreation facilities, computer center, community garden, and outdoor gathering areas.
2. The proposed relocation plan is acceptable, as the units have been vacant since 2010, and EPHA demonstrated that they worked closely with affected residents during the relocation process to answer questions; provide counseling/advisory services; and to oversee the reimbursement of resident relocation expenses. As a result, 45% of displaced families used housing choice vouchers to port to areas of higher opportunity.
3. The subject property consists of two (2) buildings and 100 units. The existing units have been vacant since 2010 and are distressed and present community safety hazards. The replacement housing will increase the current stock of available affordable housing by 200% by the end of phase two of redevelopment.
4. The five (5) UFAS units lost in conjunction with this demolition will be replaced as a part of the 180 1 units that will be erected during phase 1.
5. EPHA is not on HUD's civil rights threshold list.
6. There were no civil rights or fair housing issues raised by any of the residents in the occupied units of the development where the units are located or within the EPHA jurisdiction at the time the demolition application was submitted.
7. EPHA certified that the proposed demo will be conducted in accordance with all Applicable HUD civil rights related requirements, including but not limited to 24 CFR 970.5.

Based on the application submitted, and the additional information obtained by the reviewer, this application does not pose any concerns regarding the civil rights of the residents. Therefore, FHEO recommends approval of the demolition application.

Should you have any questions or concerns, please contact Carlton J. Cosby, Equal Opportunity Specialist, FHEO, Programs and Compliance Division at (678) 732-2077 or by email at Carlton.J.Cosby@hud.gov

cc:
Ada Holloway, PIH, Georgia

July 2011

**FHEO CHECKLIST
REVIEWING DEMOLITION/DISPOSITION APPLICATIONS**

Please provide all requested information and any supporting data in the “COMMENTS” column. Further justification may be submitted as an attachment to the checklist.

NAME OF PHA: East Point Housning Authority

ADDRESS OF PHA: P.O. Box 91363, East Point, GA 30364

PHA CONTACT PERSON: Michael Spann

DATE OF REVIEW: 3/22/2017

FHEO LOCAL OFFICE CONDUCTNG REVIEW: Atlanta

NAME OF FHEO ANALYST: Carlton J. Cosby

NAME OF FHEO REVIEWING OFFICIAL: _____

PHONE NUMBER OF FHEO REVIEWING OFFICIAL: 678-732-2077

NAME OF LOCAL PIH REVIEWER: _____

PHONE NUMBER OF LOCAL PIH REVIEWER: _____

DATE APPLICATION RECEIVED FROM SAC: 2/17/2017

DATE FHEO REVIEW DUE: 3/31/2017

**Office of Fair Housing and Equal Opportunity
Demolition/Disposition Review Checklist**

I. General Considerations	Comments			
1. Is this a demolition or a disposition application or both?	Demolition			
2. What is the underlying rationale and justification for the proposed demolition/disposition? (See section 5, items 6 and 7 of the applicant's narrative).	Per its response, the East Point Housing Authority plans to replace vacant and dilapidated housing units with new ones. The PHA asserts this will keep with the Mission and Strategic Plan to increase the supply of affordable housing. In two phases, it will replace the current 100 new ones with approximately 300 new units in an amenity-filled community.			
3. Comparison of Demographic Characteristics of the Population of the Proposed Demo/Dispo Units with Surrounding Areas				
	Demo/Dispo Project %	Census Tract %	PHA-Wide Inventory %	PHA Jurisdictional Area %
White	%	14%	0%	14%
Black or African American	99%	72%	99%	72%
Asian	%	0%	0%	0%
American Indian or Alaska Native	%	0%	0%	0%
Native Hawaiian or Other Pacific Islander	1%	3%	1%	3%
Hispanic or Latino	%	10%	0%	11%

**Office of Fair Housing and Equal Opportunity
Demolition/Disposition Review Checklist**

<p>4. How many units are in the PHA's overall housing unit inventory? Please indicate by unit bedroom (BD) type. (See PIC data).</p>	<p>Total # of units: 383</p> <table border="1"> <tr> <td># 16 - 0 BD</td> <td rowspan="6">380 dwelling and 3 Non-dwelling units.</td> </tr> <tr> <td># 116 - 1 BD</td> </tr> <tr> <td># 108 - 2 BD</td> </tr> <tr> <td># 98 - 3 BD</td> </tr> <tr> <td># 35 - 4 BD</td> </tr> <tr> <td># 7 - 5 BD</td> </tr> </table>		# 16 - 0 BD	380 dwelling and 3 Non-dwelling units.	# 116 - 1 BD	# 108 - 2 BD	# 98 - 3 BD	# 35 - 4 BD	# 7 - 5 BD
# 16 - 0 BD	380 dwelling and 3 Non-dwelling units.								
# 116 - 1 BD									
# 108 - 2 BD									
# 98 - 3 BD									
# 35 - 4 BD									
# 7 - 5 BD									
<p>5. How many units are currently occupied by tenants? Please indicate by unit bedroom (BD) type. (See PIC Special Report run for this information).</p>	<p>Total # of units: 182</p> <table border="1"> <tr> <td># 0 - 0 BD</td> <td rowspan="6">180 dwelling and 2 non-dwelling</td> </tr> <tr> <td># 24 - 1 BD</td> </tr> <tr> <td># 56 - 2 BD</td> </tr> <tr> <td># 70 - 3 BD</td> </tr> <tr> <td># 23 - 4 BD</td> </tr> <tr> <td># 7 - 5 BD</td> </tr> </table>		# 0 - 0 BD	180 dwelling and 2 non-dwelling	# 24 - 1 BD	# 56 - 2 BD	# 70 - 3 BD	# 23 - 4 BD	# 7 - 5 BD
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# 24 - 1 BD									
# 56 - 2 BD									
# 70 - 3 BD									
# 23 - 4 BD									
# 7 - 5 BD									
<p>II. Project Description of Proposed Demolition/Disposition</p>	<p style="text-align: center;">Comments</p>								
<p>6. What is the name and address of the project(s)? (See section 4 of the application).</p>	<p>Hillcrest Homes 1847 Stanton Road, East Point, GA 30344</p>								
<p>7. What is the total number of building(s) in the project? (See section 5, paragraph 3 of the application).</p>	<p>Total # of buildings: 2</p>								
<p>8. What is total number of units proposed for demo/dispo, and the breakdown of the loss of units for the proposed demo/dispo by unit bedroom (BD) type? (See Section 5, paragraph 2 of the application).</p>	<p>Total # of units: 100</p> <table border="1"> <tr> <td># 0 - 0BD</td> <td rowspan="6"></td> </tr> <tr> <td># 12 - 1BD</td> </tr> <tr> <td># 48 - 2BD</td> </tr> <tr> <td># 28 - 3BD</td> </tr> <tr> <td># 12 - 4BD</td> </tr> <tr> <td># 0- 5BD</td> </tr> </table>		# 0 - 0BD		# 12 - 1BD	# 48 - 2BD	# 28 - 3BD	# 12 - 4BD	# 0- 5BD
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# 12 - 1BD									
# 48 - 2BD									
# 28 - 3BD									
# 12 - 4BD									
# 0- 5BD									

**Office of Fair Housing and Equal Opportunity
Demolition/Disposition Review Checklist**

<p>9. How many units are occupied/vacant by each unit bedroom BD type in the project(s) to be demolished/disposed? (See PIC Special Report run for this breakdown).</p>	Total # of units: 100	
	# 0 - 0 BD	<p>The EPFA has 100 units to be demolished spanning two buildings. The units have been vacant since 2008.</p>
	# 12 - 1 BD	
	# 48 - 2 BD	
	# 28 - 3 BD	
	# 12 - 4 BD	
# 0 - 5 BD		
<p>10. Is there a percentage loss of units for the proposed demo/dispo by unit bedroom (BD) type for the entire project? (Calculate based on information provided in sections 4 and 5 of the application).</p>	0 % - 0BD	
	12 % - 1BD	
	48 % - 2BD	
	28 % - 3BD	
	12 % - 4BD	
	0 % - 5BD	
<p>11. Is there a percentage loss of units for the proposed demo/dispo of the total number of units for the PHA's housing inventory by unit bedroom (BD) size? (Calculate based on information in this checklist).</p>	0 % - 0BD	
	10 % - 1BD	
	44 % - 2BD	
	29 % - 3BD	
	34 % - 4BD	
	0 % - 5BD	
<p>12. Is there a percentage loss of UFAS accessible units by unit bedroom (BD) type for the entire project? (See PIC data).</p>	% - 0BD	<p>There is a 100% loss of UFAS accessible units for the entire project. All of the subject property is being demolished.</p>
	100 % - 1BD	
	% - 2BD	
	% - 3BD	
	% - 4BD	
	% - 5BD	

**Office of Fair Housing and Equal Opportunity
Demolition/Disposition Review Checklist**

13. If the answer to question 12 is yes, what is the percentage loss of UFAS accessible units by unit bedroom (BD) type for the PHA's entire housing inventory?	0 % - 0BD 100 % - 1BD 0 % - 2BD 0 % - 3BD 0 % - 4BD 0 % - 5BD	All of the UFAS 1 BD units in EPHAs inventory are located in Hillcrest Homess. All of subject property will be demolished. There will be a 100% loss of 1 BD UFAS units. There will be 0% loss in all other categories.			
14. List the civil rights characteristics (race, national origin, familial status, and/or disability, etc.) of the project's current residents by unit size. (See PIC Special Report run for this information). Please use Section VI, Additional Comments & Analysis on page 12, if you need additional space.					
0Bedroom	Hispanic	White Non- Hispanic	African American Non- Hispanic	Asian Non-Hispanic	Other (e.g., Families with Children, Disabled individuals, etc.) _____
0Bedroom	0%	0%	0%	0%	0%
1Bedroom	0%	0%	0%	0%	0%
2Bedroom	0%	0%	0%	0%	0%
3Bedroom	0%	0%	0%	0%	0%
4Bedroom	0%	0%	0%	0%	0%
5Bedroom	0%	0%	0%	0%	0%
III. Civil Rights/Affirmatively Furthering Fair Housing (AFFH)			Comments		
15. Does the PHA have any outstanding lawsuits, consent decrees, settlement so, please describe the relationship agreements, VCAs, letters of findings or pending investigations? If so, please describe the relationship between these actions and the demo/dispo application. These actions could serve as the basis for disapproving the demo/dispo application depending on the factual and legal circumstances.			None known at present time.		

**Office of Fair Housing and Equal Opportunity
Demolition/Disposition Review Checklist**

<p>16. Under section 7 "Resident Consultation" in the applicant's narrative, do tenants raise any civil rights/fair housing issues or concerns? Were these issues and concerns adequately addressed by the PHA in their narrative?</p>	<p>Per the PHA, there were several surveys conducted and meetings held from the beginning to end of the transition process. The EPFA indicated no issues raised by tenants. The concerns indicated were mainly around tenants porting with HCVs and to areas outside of EPFAs territory - specifically high opportunity areas. The EPFA asserted these were dealt with via negotiations with other HAs and researching options for tenants.</p>
<p>17. How does this proposed demo/disposition affect the PHA's obligation to affirmatively further fair housing under 24 CFR 903.7(o)? If applicable, does the application narrative indicate that tenants will have realistic choices to live in higher opportunity areas (e.g., better quality public elementary schools, greater public transportation, employment, health care, retail, recreational and cultural opportunities)?</p>	<p>East Point Housing Authority indicates that the proposed demolition will increase the number of available low-income housing units from 100 - 300; which increases the availability of affordable housing by 200 percent. The EPFA also suggest the new development will be amenity-filled as opposed to the current; inclusive of onsite laundry and other elements that make functionality better for tenants.</p>
<p>18. If applicable, has the applicant's narrative described sufficient counseling and advisory services to affected tenants that promote fair housing choice and the opportunity to assist residents obtain housing in high opportunity areas? (See section 6, item 3 of the application).</p>	<p>Yes. The EPFA asserts that it provided site visits within its jurisdiction to locations that honored the HCV. Classes public transportation, job readiness, and budgeting were mandatory; suggestions for car pooling with other residents and family members to assist with exploring locations not on the bus line were made; and realtors and agents were partnered with to offer information of available properties. EPFA also asserts it assisted with tenants porting outside of jurisdiction by negotiating with other HAs and researching viable options for tenants.</p>

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Demolition/Disposition Review Checklist**

<p>19. If applicable, does the proposed demo/dispo create the conditions for minority de-concentration among the PHA's existing tenant population? (See the information contained in this application and the application narrative).</p>	<p>Based on the EPHA report, 45% of the affected residents moved to high-opportunity areas. This was 45 people out of a group where 99% of the tenants were minority and 1 % were "other". The rest of the tenants remained in EPHA's minority concentrated jurisdiction.</p>
<p>20. Identify and analyze any potential discriminatory effects that the proposed demo/dispo may have upon the supply, location, availability, or affordability of housing for protected class members under the federal civil rights laws, including but not limited to discriminatory effects prohibited by 24 CFR 1.4. To the extent that such discriminatory effects are identified, consider less discriminatory alternatives and identify concrete steps reasonably calculated to avoid, minimize, or mitigate the discriminatory effects.</p>	<p>None identified.</p>
<p>21. Are there any objections raised by third party advocacy groups or other interested parties (e.g., legal aid organizations local community groups etc.) regarding the proposed demo/disposition that are not stated in the application? (Notify SAC personnel of these objections).</p>	<p>None noted</p>

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Demolition/Disposition Review Checklist**

<p>22. Are there any objections raised by third party advocacy groups or other interested parties (e.g., legal aid organizations local community groups etc.) regarding the proposed demo/disposition that are not stated in the application? (Notify SAC personnel of these objections).</p>	<p>None identified.</p>
IV. Relocation Plan (If Applicable)	Comments
<p>23. Please indicate the anticipated types of proposed relocation housing opportunities, the numbers of tenants for each type of relocation housing opportunity, and the types of relocation services that will be offered (See section 6 of the application and the accompanying narrative).</p>	<p><input type="checkbox"/> A: newly constructed PHA building(s) with comparable rents and amenities.</p> <p style="padding-left: 40px;">Total # of tenants:</p>
	<p><input type="checkbox"/> B: rehabilitated public housing within the PHA's jurisdiction with comparable rents and amenities.</p> <p style="padding-left: 40px;">Total # of tenants:</p>
	<p><input type="checkbox"/> C. private housing through HCV assistance</p> <p style="padding-left: 40px;">Total # of tenants:</p>
	<p><input checked="" type="checkbox"/> D: placement in existing vacant PHA units within the PHA's jurisdictional area with comparable rents and amenities.</p> <p style="padding-left: 40px;">Total # of tenants: 74</p>
	<p><input checked="" type="checkbox"/> E. counseling and advisory services</p>
	<p><input checked="" type="checkbox"/> F. relocation expenses (moving expenses, rent subsidies, security deposit, etc.)</p>
	<p><input checked="" type="checkbox"/> G. other relocation services (please specify) <u>HCV ports to options in and out of Juris</u></p>

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<p>24. If comparable replacement housing is already planned, evaluate the applicant's narrative concerning the proposed quality, rent levels, services, amenities of the housing, and its geographical area. (See section 6 of the application). Is the replacement housing comparable to or better than the existing proposed demo/dispo housing?</p>	<p>According to the EPHA, the existing development is severely vandalized, distressed, and pose a hazard to the community. The proposed development would provide needed affordable housing; and a new, amenity-filled complex that would be more beneficial to residents. Amenities include: Community Room, Community Garden, computer center, fitness center, on-site laundry, ceiling fans, Energy Star appliances, and exterior gathering areas. The EPHA asserts better housing has been planned for the site.</p>
<p>25. Will the proposed replacement housing project, if applicable, be located in a housing market area that is less minority concentrated? (Consider the applicant's narrative and Census data by census tract).</p>	<p>The replacement housing is located in the same housing market area of the East Point Housing Authority. External services (retail, schools, healthcare etc.) will remain the same.</p>
<p>26. Has the application described how many new replacement housing units by bedroom size will meet the accessibility requirements of section 504 of the Rehabilitation Act of 1973? Has the application also specifically described if the replacement housing will fulfill the 5 percent, two percent requirements by bedroom size? If existing accessible housing units are identified as replacement units, where is the location of these units and what are available bedroom sizes?</p>	<p>The EPHA asserts a total of 7% of the total units will meet accessibility requirements of section 504 of the Rehabilitation Act of 1973. Total unit count is 180. Nine units will meet mobility impaired standards and 4 will meet sight/hearing impaired standards. The 504 accessible units will be spread throughout bedroom type. Of the 5% of units meeting mobility impaired standards accessibility requirements, 2.8% will be 1BR and 2.2% 2BR. 2.2% of the total units will be 1BR units that meet mobility impaired accessibility requirements. Additionally, of the 2.2% of units meeting sight and/or hearing impaired accessibility unit standards, EPHA asserts 1.1% will be 1BR and 1% will be 2BR units.</p>

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Demolition/Disposition Review Checklist**

<p>27. If relocation to private housing is contemplated, will tenants have a realistic opportunity to move to higher opportunity areas (e.g., areas with better schools, employment, transportation opportunities) based on the extent of assistance offered (HCVs, housing market area rents, counseling services, and other relocation assistance) described in section 6 of the application?</p>	<p>According to EPHA tenants had real opportunities to relocate to higher opportunity areas. It asserts that to assist, site visits within the EPHA jurisdictions were made to locations that honored the Housing Choice Voucher (HCV). It further asserts classes on public transportation were offered; and local realtors/agents were partnered with as information sources of available properties.</p>
<p>28. Please comment on the likely housing market areas/communities where tenants will relocate through HCV assistance or other HUD assistance programs and the extent of improved housing choices and opportunities under the relocation plan.</p>	<p>According to EPHA, 45% of the tenants who were displaced ported out to high opportunity areas.</p>
<p>29. Discuss the strength of the applicant's narrative in section 6 in describing assistance for individuals with disabilities in finding accessible housing (e.g., HCVs, agreements with private landlords, assistance with reasonable modifications)? What types of specific assistance and their projected costs are discussed?</p>	<p>According to EPHA priority was given to the elderly and disabled. Some residents were assisted via referrals to social security; the GA Department of Labor for their Vocational Resource Department to assist with job search, SSI assistance, and any available services for eligible benefits.</p>

**Office of Fair Housing and Equal Opportunity
Demolition/Disposition Review Checklist**

<p>30. List the demographic characteristics (race, national origin, familial status, and/or disability, etc.) of the PHA's HCV program. (See PIC Special Report Run for this information).</p>	<p>Hispanic</p>	<p>White Non-Hispanic</p>	<p>African American Non-Hispanic</p>	<p>Other (e.g. Families with Children, Disabled individuals, etc.) Asian _____</p>
	<p style="text-align: center;">%</p>	<p style="text-align: center;">1%</p>	<p style="text-align: center;">99%</p>	<p style="text-align: center;">0%</p>
<p>31. List the demographic characteristics (race, national origin, familial status, and/or disability, etc.) of the PHA's HCV waiting list.</p>	<p>Hispanic</p>	<p>White Non-Hispanic</p>	<p>African American Non-Hispanic</p>	<p>Other (e.g. Families with Children, Disabled individuals, etc.) _____</p>
	<p style="text-align: center;">0%</p>	<p style="text-align: center;">1%</p>	<p style="text-align: center;">99%</p>	<p style="text-align: center;">0%</p>
<p>32. Please describe what affirmative steps the PHA has taken in the past to assist HCV individuals find housing in high opportunity areas? What new efforts or strategies are contemplated in the application narrative?</p>	<p>According to the EPFA, site visits were made to locations that honored the Housing Choice Vouchers. To avoid tenants experiencing resistance in possible relocation neighborhoods, EPFA monitored the number of families moving into various areas; and tenants were offered workshops to assist them in being successful in any area they may relocate.</p>			
<p>33. Are displaced tenants given preference to any Site Based Waiting Lists managed by the PHA?</p>	<p>Per EPFA displaced tenants were offered priority for any openings at all of its public housing units - including Norman Berry Village, Martel Homes, and Hurd Homes.</p>			

**Office of Fair Housing and Equal Opportunity
Demolition/Disposition Review Checklist**

<p>34. In your opinion, is this relocation plan acceptable? Please elaborate on the reasons why or why not.</p>	<p>Yes. The relocation plan is acceptable. The plan considered all tenants involved and provided substantive approaches to relocation based on need and resources.</p>
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V. Additional Comments & Analysis. Please use additional sheets if necessary.

In particular, focus on any changes, modifications, or conditions to the proposed application that would improve fair housing choice for residents, or that would avoid, minimize, or mitigate any discriminatory effects of the proposed demolition/disposition application.

Based on the information obtained and reviewed, it would be advantageous for the EPHA to demolish the Hillcrest Homes site. The existing units have been vacant since 2010; severely vandalized; are distressed; and pose a hazard to the community. This replacement housing will increase the current stock of available affordable housing by 200 percent after phase two; providing 300 better-quality, amenity filled units. The amenities include: on-site laundry, energy efficient appliances, ceiling fans, recreation facilities, and outdoor gathering areas. Due to the status of the current site, the funds currently being received by the EPHA are not put to the most beneficial use. It should be noted that Hillcrest Homes currently represents 26% of the EPHAs housing inventory, while EPHA boasts a waiting list of over 800 people. The ability to move forward with demolition would allow the EPHA to advance its mission of increasing the supply of quality affordable housing. Phase one of the replacement housing - 180 units - will start soon after demolition. The new site will meet all HUD requirements including UFAS regulations.

**Office of Fair Housing and Equal Opportunity
Demolition/Disposition Review Checklist**

For HUD - Office of Fair Housing and Equal Opportunity Use Only	
Recommendation for Approval/Disapproval: Approval (Indicate only one)	
Carlton J. Csoby	
FHEO Reviewer	(print name)
Atlanta	
FHEO Local Field Office	
Signature of FHEO Reviewer	Date