

DESIGNATED HOUSING PLAN

AMP AL047-000060P – Gateway Place

May 11, 2011

INTRODUCTION

The Huntsville Housing Authority is seeking to designate the 48 Low-Income Public Housing units in its 86-unit, mixed-finance property for occupancy by persons 62 years or older only. The remaining units of this development are funded through Low-Income Housing Tax Credits (LIHTC) and are already designated for occupancy by persons 62 years or older. The designation of the LIPH is essential to the new property's purpose.

Several years ago, the Authority conducted a Strategic Facilities Analysis to assess the viability of all of its properties and to develop a long-term plan for renewing those assets and providing affordable housing that meets the specific needs of the community. This new property is located on the site of the former development Council Courts and is part of the overall redevelopment strategy for the site. The site is adjacent to a large, regional health care facility and the development plan includes specific linkages to services for the elderly through the health care facility and other area service providers.

Gateway Place was designed and is being developed as a senior facility and construction completion is estimated to be August 1, 2011. Full lease up is expected to be achieved by October 1, 2011. The goal for this development is to provide a dedicated resource for the low-income elderly residents of Huntsville. As the elderly population grows due to the aging of the "baby boomers", the demand for units dedicated for seniors will increase. In order to meet that need, the Authority established a goal to designate this property for occupancy by elderly families only and has included dedicated resources for senior residents in its master redevelopment plan.

The Authority is seeking to designate a total of 48 units of its low-income public housing units for occupancy by the elderly only. This represents 2.9% of the total LIPH stock and will be the only property

that is designated as elderly-only. The Authority has a total of 390 one-bedroom units (including the 43 units included in the designation request) and the designated units represent 11.0% of the total one-bedroom stock. The Authority has a total of 578 two-bedroom units (including the 5 units included in the designation request) and the designated units represent 0.9% of the total two-bedroom stock. The Authority has 347 other one-bedroom units that are available to the elderly and disabled and this includes two elderly high-rises (Johnson Towers – 120 units and Todd Towers – 100 units) with a total of 97 one-bedroom units.

Since the units are currently under development, there is no requirement for the provision of alternate resources for existing non-elderly, disabled residents. The designation of the units in the Gateway Place will not affect the availability of affordable housing for non-elderly, disabled applicants or residents.

JUSTIFICATION FOR DESIGNATION

The Gateway Place property is a new mixed-finance development with a total of 86 units. Of these 48 are LIPH units and 38 are LIHTC units. This development was specifically planned as a comprehensive effort to provide dedicated resources to elderly persons. Part of the development plan includes the coordination of services aimed at the needs of the low-income elderly population including linkages to Huntsville Hospital and other area medical providers. The goal of the development is to provide housing resources and services that are specifically tailored to the elderly.

This property occupies a portion of the site of the former Councill Courts development and it is an integral part of the overall redevelopment plan for the site. The redevelopment plan includes affordable housing resources that will address the needs of an aging population. The designation of this property as elderly-only is critical to the long-term viability of the development and will ensure consistency with the remaining 38 LIHTC units (these are developed as elderly-only housing).

Currently, the Authority has sufficient alternative resources for non-elderly disabled families on the waiting list. Since this property is new and is not occupied, there is no requirement to address the needs of existing residents. The Authority has sufficient housing stock available for the non-elderly disabled applicants that may be affected by the designation is its 98 other efficiency units, its 347 other one-bedroom units, and its 555 other two-bedroom units.

This designation is also consistent with the City of Huntsville’s Consolidated Plan. The Consolidated Plan includes a section under its Housing Needs Assessment that specifically addresses the need for elderly housing. In addition, the section also provides insight to the disabled population indicating that the largest segment of the disabled population was also elderly. This further supports the designation. An excerpt from the plan is presented below:

3.5: SPECIAL NEEDS - NOT HOMELESS

This section provides a discussion on the estimated number of non-homeless persons in need of supportive housing (See Table 1B in the Appendix). The discussion includes estimates of elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDs and their families, and public housing residents.

a. Elderly / Frail Elderly

According to the 2008 American Community Survey (ACS), Huntsville had 26,070 residents that were 65 years and over, representing 15.8% of the population. Of the total elderly population, the majority – 13,877 were 65 to 74 years old and 8,630 were 75 to 84 years old. The frail elderly – 85 years and older, made up 3,563 or 2.2% of the city’s population. ACS (2008) also reports that 6.4% of the population 65 years and older has incomes in the previous 12 months below the poverty level.

b. Persons with Disabilities

ACS (2008) reports that in 2008 the total non-institutionalized population in the city of Huntsville was 168,443. Of these 20,631 (12.6%) reported a disability. The elderly population (65 years and older) had the largest percentage of persons with a disability (Table 4.4a).

PROJECT DESCRIPTION

The Authority is proposing to designate all 48 Low Income Public Housing units in AMP AL047000060 for occupancy by persons who are 62 or older (elderly-only). This development represents one of a total of fifteen total properties and represents 2.9% of the total LIPH units available for occupancy. A summary of the Authority’s properties, by bedroom size, is presented on the following page.

In addition to the units indicated in the table, a total of 14 units are offline for common use. These were not included in the unit counts because these units are not available for occupancy. A list of the units offline for common use is provided on the page following the chart of all units.

Huntsville Housing Authority

Breakdown of Units by Bedroom Size

AMP Number	Development Name	Property Designation	Breakdown of Units by Bedroom Size					Total Units	
			0	1	2	3	4		5
AL047000002	Butler Terrace	Family	0	20	62	34	2	120	
AL047000003	Sparkman Homes	Family	0	15	71	70	10	168	
AL047000004	Butler Terrace Addition	Family	0	12	61	50	8	133	
AL0470000051	Brookside	Family	0	26	39	7	0	72	
AL0470000052	Lincoln Park	Family	0	42	71	60	16	193	
AL047000006	Northwoods	Family	0	58	86	67	17	232	
AL047000007	Northwoods Addition	Family	0	46	89	53	19	212	
AL047000008	Johnson Towers	Elderly/Disabled	38	70	11	1	0	120	
AL047000010	Searcy Homes	Family	0	9	23	17	22	78	
AL047000011	Todd Towers	Elderly/Disabled	60	37	2	1	0	100	
AL047000014	L. R. Patton Apartments	Family	0	10	0	94	0	104	
AL047000016	Scattered Sites	Family	0	0	6	20	0	26	
AL047000018	Mahogany Row	Family	0	0	8	4	0	12	
AL047000019	Stone Manor	Family	0	1	42	6	0	49	
AL047000060	Gateway Place*	Elderly Only**	0	43	5	0	0	48	
Unit Totals			98	390	578	487	98	31	1,667

* Units indicated in the chart are the Low-Income Public Housing units only as included in the designation request

** As requested in this Designated Housing Plan

Note: The above unit counts do NOT include units offline for common use. A total of 14 additional units are approved offline units.

These units offline for common use are listed below:

<u>AMP #</u>	<u>Dev Name</u>	<u>Unit Address</u>	<u>Unit Purpose</u>	<u># BR</u>
AL047000003	Sparkman Homes	102A Mason Ct.	Development Office	1
AL047000003	Sparkman Homes	141D Mason Ct.	Resident Council Office	3
AL047000004	Butler Terr. Addn.	2305 C Brahan Ave.	Resident Council Office	2
AL047000052	Lincoln Park	405A Webster Dr.	Resident Council Office	2
AL047000006	Northwoods	1403A Yukon St.	Adult Education Center	1
AL047000006	Northwoods	1403B Yukon St.	Adult Education Center	1
AL047000006	Northwoods	1403C Yukon St.	Adult Education Center	2
AL047000014	L. R. Patton Apts.	228A Binford Dr.	Econ. Self Sufficiency Ctr.	3
AL047000014	L. R. Patton Apts.	228D Binford Dr.	Econ. Self Sufficiency Ctr.	3
AL047000014	L. R. Patton Apts.	228E Binford Dr.	Econ. Self Sufficiency Ctr.	3
AL047000014	L. R. Patton Apts.	228F Binford Dr.	Econ. Self Sufficiency Ctr.	3
AL047000014	L. R. Patton Apts.	228G Binford Dr.	Econ. Self Sufficiency Ctr.	3
AL047000014	L. R. Patton Apts.	228H Binford Dr.	Econ. Self Sufficiency Ctr.	3
AL047000019	Stone Manor	7722 Benaroya Ln #100	Development Office	1

Adding the off-line units to the units available for occupancy as outlined in the chart on the preceding page, the total number of ACC units is 1,681. The units being requested for designation represent 2.9% of the total ACC units.

Since Gateway Place is a new, mixed-finance development, there is no impact on current residents since none of the units are occupied. This development also includes 38 LIHTC units, which are already designated for occupancy by the elderly only. The design of the units and the property are specifically for residents 62 years or older. The development plan also includes linkages to supportive services that are specifically designed for elderly persons and is part of the Authority's master redevelopment plan.

The designation of the LIPH units at Gateway Place does have a minor affect on existing applicants in that the increased LIPH units would not be available to the non-elderly disabled persons on the waiting list. In order to assess the impact on the current and future applicants, the following summary of current occupancy is provided.

Huntsville Housing Authority

Summary of Households by Elderly and/or Disabled Designation

AMP Number	Development Name	Elderly but Not Disabled HH		Elderly and Disabled HH		Non-Elderly but Disabled HH		Total Households
		No.	%	No.	%	No.	%	
AL047000002	Butler Terrace	1	0.8%	6	5.1%	33	28.0%	118
AL047000003	Sparkman Homes	1	0.6%	7	4.5%	14	8.9%	157
AL047000004	Butler Terrace Addition	1	0.8%	9	6.9%	35	26.7%	131
AL047000051	Brookside	4	5.6%	21	29.2%	29	40.3%	72
AL047000052	Lincoln Park	4	2.1%	16	8.3%	52	27.1%	192
AL047000006	Northwoods	9	3.9%	36	15.6%	61	26.4%	231
AL047000007	Northwoods Addition	9	4.3%	29	14.0%	60	29.0%	207
AL047000008	Johnson Towers	5	4.2%	51	42.5%	60	50.0%	120
AL047000010	Searcy Homes	2	3.1%	20	31.3%	32	50.0%	64
AL047000011	Todd Towers	10	10.1%	34	34.3%	55	55.6%	99
AL047000014	L. R. Patton Apartments	0	0.0%	2	2.0%	20	19.6%	102
AL047000016	Scattered Sites	0	0.0%	0	0.0%	3	11.5%	26
AL047000018	Mahogany Row	0	0.0%	0	0.0%	2	16.7%	12
AL047000019	Stone Manor	0	0.0%	12	25.0%	2	4.2%	48
AL047000060	Gateway Place*	0	0.0%	0	0.0%	0	0.0%	0
Unit Totals		46	2.9%	243	15.4%	458	29.0%	1,579

* Property is not occupied.

Based upon the information provided in the preceding chart, 2.9% of the existing households are elderly only, 15.4% are elderly and disabled, and 29.0% are non-elderly disabled.

AREA DEMOGRAPHICS

In order to assess the effect of the designation on the availability of affordable housing to the certain population groups, a review of area demographics for the City of Huntsville was conducted. Based on Census data, 25,681 persons 62 and older out of a total population of 158,216, representing 16.2% of the total population. This includes the institutionalized population as well.

Based on the same Census data, the noninstitutionalized population of the City of Huntsville is 146,603 persons. A total of 22,562 persons below the age of 16, representing 15.4% of the total population and 1,304 reported one or more disability. This results in 5.8% of the total population under the age of 16 being disabled. For the population 16 to 64, there are a total of 103,709 persons or 70.7% of the total population. In this age group, 17,898, or 17.3% of this age group, reported one or more disability. For the population 65 and over (data is unavailable for 62 and over), there are a total of 20,332 persons or 13.9% of the total population. In this age group, 8,554, or 42.1% of this age group, reported one or more disability.

When comparing the information above with the current occupancy data in the preceding chart, the Authority's current disabled population is consistent with that of the City of Huntsville. Based on the data above 15.4% of the total population would not be eligible as a qualifying disabled household (unless the minor is emancipated), 70.7% are non-elderly, and 13.9% are elderly. When the disability data is overlaid to the total population, 12.2% of the population would be considered non-elderly disabled and 5.8% would be considered elderly and disabled.

Disability has the largest impact on the group of persons that are 65 and older with 42.1% of this population classified as elderly and disabled. This designation will not affect the availability of housing resources for this group. Only 17.3% of the population between 16 and 64, inclusive, is disabled; therefore, sufficient housing resources are available through the Authority's other one and two bedroom units (this action affects only these bedroom size units).

ASSESSMENT OF ACCESSIBLE UNITS

The proposed action does not affect the availability of accessible units since it does not involve the removal of any units from the inventory that is available to the non-elderly disabled applicants. The design for Gateway Place includes a total of 5 fully accessible units designed to UFAS standards. Based on the total of 86 units, this represents 5.8% of the total units. Accessible units will be distributed on a per-unit basis between the LIPH units (48) and the LIHTC units (38). A total of two units will be made sensory accessible, representing 2.3% of the total units. One will be a LIPH unit and one will be a LIHTC unit.

Summaries of accessible units, by development, are presented on the following two pages. The first page includes units that are accessible to the mobility impaired and the second includes the units that are accessible to the sensory impaired (sight and/or sound accessible).

Based on the charts, the Authority has 5.6% of its units accessible to the mobility impaired and 2.6% accessible to the sensory impaired. The mobility accessible units proposed in the designation represent 3.2% of the total mobility accessible units and the sensory accessible units proposed in the designation represent 2.3% of the total sensory accessible units. The total units in the designation (48) represent 2.9% of the total units available for occupancy; therefore, this designation does not affect the availability of accessible units to the non-elderly disabled residents.

SECTION 8 OCCUPANCY

Currently, the Authority operates a Housing Choice Voucher (HCV) Program with a total of 1,469 vouchers under contract. In addition, the Authority operates a Veterans Affairs Supportive Housing Program (VASH) with a total of 38 vouchers under contract. Total vouchers under contract are 1,507.

For the HCV program, a total of 92 households are elderly (6.3%), 67 households are elderly and disabled (4.6%), and 357 households are non-elderly disabled (24.3%). For the VASH program, one household is elderly (2.6%), one household is elderly and disabled (2.6%), and 12 households are non-elderly disabled (31.6%). When this data is compared to the population, the non-elderly disabled households under contract in the HCV program are approximately double that of the population as a whole (based on percentages). This indicates that the voucher program is a significant resource to the non-elderly disabled population. For the VASH program, the percentage is increased due to VASH program requirements.

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Mobility Accessible Units by Bedroom Size

AMP Number	Development Name	Mobility Accessible Units by Bedroom Size							Total Accessible Units	Total Units	Percentage of Accessible Units
		0	1	2	3	4	5				
AL047000002	Butler Terrace	0	0	0	0	0	0	0	120	0.0%	
AL047000003	Sparkman Homes	0	0	0	0	0	0	0	168	0.0%	
AL047000004	Butler Terrace Addition	0	1	2	2	0	0	5	133	3.8%	
AL047000051	Brookside	0	3	2	1	0	0	6	72	8.3%	
AL047000052	Lincoln Park	0	7	9	5	1	0	22	193	11.4%	
AL047000006	Northwoods	0	3	1	15	0	0	19	232	8.2%	
AL047000007	Northwoods Addition	0	5	9	5	3	0	22	212	10.4%	
AL047000008	Johnson Towers	0	0	0	1	0	0	1	120	0.8%	
AL047000010	Searcy Homes	0	2	0	1	0	2	5	78	6.4%	
AL047000011	Todd Towers	0	1	2	0	0	0	3	100	3.0%	
AL047000014	L. R. Patton Apartments	0	2	0	5	0	0	7	104	6.7%	
AL047000016	Scattered Sites	0	0	0	0	0	0	0	26	0.0%	
AL047000018	Mahogany Row	0	0	0	0	0	0	0	12	0.0%	
AL047000019	Stone Manor	0	0	0	0	0	0	0	49	0.0%	
AL047000060	Gateway Place*	0	2	1	0	0	0	3	48	6.3%	
Unit Totals		0	27	28	38	8	7	93	1,667	5.6%	

* Units indicated in the chart are the Low-Income Public Housing units only as included in the designation request

Huntsville Housing Authority

Sensory Accessible Units by Bedroom Size

AMP Number	Development Name	Sensory Accessible Units by Bedroom Size						Total Accessible Units	Total Units	Percentage of Accessible Units
		0	1	2	3	4	5			
AL047000002	Butler Terrace	0	0	0	0	0	0	0	120	0.0%
AL047000003	Sparkman Homes	0	0	0	0	0	0	0	168	0.0%
AL047000004	Butler Terrace Addition	0	1	0	2	0	0	3	133	2.3%
AL047000051	Brookside	0	0	2	1	0	0	3	72	4.2%
AL047000052	Lincoln Park	0	3	4	2	2	0	11	193	5.7%
AL047000006	Northwoods	0	0	0	0	0	0	0	232	0.0%
AL047000007	Northwoods Addition	0	4	4	2	1	0	11	212	5.2%
AL047000008	Johnson Towers	6	0	2	0	0	0	8	120	6.7%
AL047000010	Searcy Homes	0	2	2	1	0	0	5	78	6.4%
AL047000011	Todd Towers	0	1	0	1	0	0	2	100	2.0%
AL047000014	L. R. Patton Apartments	0	0	0	0	0	0	0	104	0.0%
AL047000016	Scattered Sites	0	0	0	0	0	0	0	26	0.0%
AL047000018	Mahogany Row	0	0	0	0	0	0	0	12	0.0%
AL047000019	Stone Manor	0	0	0	0	0	0	0	49	0.0%
AL047000060	Gateway Place*	0	1	0	0	0	0	1	46	2.2%
Unit Totals		6	13	16	12	7	5	44	1,665	2.6%

* Units indicated in the chart are the Low-Income Public Housing units only as included in the designation request

ANALYSIS OF WAITING LIST

A review of the waiting list for the Public Housing and Section 8 programs was conducted to assess the degree to which the lists are consistent with the total population as well as to assess the degree to which the programs meet the affordable housing needs of the non-elderly disabled. The Authority currently operates a single waiting list for Low Income Public Housing and that waiting list is currently open. The Authority provides a preference for elderly and/or disabled families in its Admissions and Continued Occupancy Policy for Public Housing.

The Authority maintains a waiting list for both eligible applicants and pending applicants. Eligible applicants have completed the eligibility process and are active on the waiting list and pending applicants have not completed the eligibility process. The charts below include a summary of the Public Housing waiting list, by status.

<i>Summary of Eligible Applicants for Low-Income Public Housing</i>							
Applicant Category	Breakdown by Bedroom Size					Total	% of Total
	1	2	3	4	5		
Non-Elderly, Non-Disabled	0	66	35	5	3	109	55.9%
Elderly, Non-Disabled	6	0	0	0	0	6	3.1%
Elderly, Disabled	7	0	0	0	0	7	3.6%
Non-Elderly, Disabled	59	13	0	0	1	73	37.4%
Totals	72	79	35	5	4	195	100.0%

<i>Summary of Pending Applicants for Low-Income Public Housing</i>							
Applicant Category	Breakdown by Bedroom Size					Total	% of Total
	1	2	3	4	5		
Non-Elderly, Non-Disabled	0	82	38	12	4	136	69.0%
Elderly, Non-Disabled	0	0	0	0	0	0	0.0%
Elderly, Disabled	3	0	0	0	0	3	1.5%
Non-Elderly, Disabled	52	5	0	0	1	58	29.4%
Totals	55	87	38	13	4	197	100.0%

Based upon the above, the non-elderly, disabled applicants make up 37.4% of the eligible applicants and make up 29.4% of the pending applicants. For the population as a whole, the non-elderly, disabled

persons make up 17.3% of the total. The above indicates an increased need for affordable housing resources to the non-elderly, disabled that are met through traditional LIPH units.

The housing needs of the elderly (whether disabled or not) can clearly be met through routine unit turnover. For the non-elderly, disabled, there are a total of 59 eligible applicants on the one-bedroom wait list. The Authority has a total of 347 other one-bedroom units in its stock and a total of 98 efficiency units in its stock that would be available to the non-elderly disabled. Of the total of 72 one-bedroom eligible applicants, 59 are non-elderly disabled, representing 81.9% of the total applicants. The Authority has a historical turnover rate of approximately 25% of its units; therefore, a total of approximately 122 efficiency and one-bedroom units will become available during the course of a year. This represents sufficient units to meet the demand of non-elderly, disabled applicants.

A review of the Section 8 waiting list was conducted to determine if the percentage of non-elderly, disabled applicants was consistent from program to program. Based on the data for March 2011, there are a total of 1,181 applicants for all vouchers (HCV and VASH). Of these, 32 (or 2.7%) are elderly, 16 (or 1.4%), and 192 (or 16.3%) are non-elderly, disabled. This is considerably below the percentage of public housing applicants and is also significantly below the current occupancy in the Section 8 program. If the turnover of public housing units cannot meet the demand of the non-elderly, disabled applicants, the Authority will modify its Administrative Plan and provide a preference for the elderly and/or disabled as an alternate resource.

ALTERNATIVE RESOURCES

Because the Gateway Place development is new, there is no requirement for alternative resources for existing residents. There will be no eviction or lease termination as a result of the designation and there are no relocation requirements. As a result, the alternative resource requirements are limited to those that are on the public housing waiting list that may be affected by the approval of the Designated Housing Plan.

Based upon the analysis of the public housing waiting list, the needs of the non-elderly, disabled applicants will be met through normal unit turnover within the public housing program. The Authority has sufficient units at other developments to meet the demand for the waiting list and to ensure that the wait time for a similarly eligible non-elderly, non-disabled applicant is not significantly different from the wait time for a non-elderly disabled applicant.

The Authority will continue to monitor overall wait times for each group of applicants and will assess the need for establishing a preference in the Section 8 program for the elderly and/or disabled. This will increase the housing resources available to the group affected by the approval of this designation request.

The Authority will also continue to monitor the availability of funding for specific populations and will seek any additional voucher allocations provided specifically for the disabled. In addition, this need will be taken into consideration in the design of any additional new developments in order to ensure the proper unit mix (by bedroom size) based on demand at that time.

ELIGIBILITY OF NEAR ELDERLY APPLICANTS

At the current time, the Authority does not anticipate the need to extend the eligibility criteria for Gateway Place to the near-elderly (persons 50 years or older). In the event that the Authority experiences problems in locating sufficient elderly families to occupy the designated units, it will modify its Admissions and Continued Occupancy Policy and extend the eligibility requirements to the near-elderly for the Gateway Place development.

RESIDENT AND COMMUNITY CONSULTATION

The Authority recently completed and received public comment (through Public Hearing) for its FY 2011 Agency Plan. This Plan was put out for public comment 45 days prior to the Public Hearing on January 4, 2011 and was approved by the Board on January 6, 2011.

In addition, the Authority has established both a Resident Advisory Board as well as a Redevelopment Advisory Board. Both provide input to the goals and objectives of the agency; however, the Redevelopment Advisory Board provides specific input regarding the Authority's redevelopment efforts. These Redevelopment Advisory Board meetings are held quarterly with the last meeting held on December 14, 2011. During the course of these planning meetings, the Redevelopment Advisory Board and the public as a whole has been notified of the Authority's intent to designate this property for occupancy by persons 62 or older only.

This Designated Housing Plan was also placed for public comment. The draft plan was made available on May 16, 2011 and comments were received through June 15, 2011. The following is a summary of the comments received as a result of this public notice for comments:

Summary of Comments and Disposition Here

The following page contains the notice provided for the review of the draft plan.

HUNTSVILLE HOUSING AUTHORITY

Public Notice

May 16, 2011

In accordance with HUD requirements, the Huntsville Housing Authority has developed an Allocation Plan (or Designated Housing Plan) that seeks to designate the public housing units in the Gateway Place Development (48 units total) as elderly-only units. This action will result in the Gateway Place Development being available only to persons that are 62 or older.

All Huntsville Housing Authority residents, any advocacy groups for elderly and or disabled persons, and any interested citizens are invited to review this Designated Housing Plan between 9:00 AM and 4:00 PM, local time, at the following location until **June 15, 2011**:

Huntsville Housing Authority
200 Washington Street
Huntsville, Alabama 35801

Any written comments may be directed to Carlen Bailey Williams, Development Director, at the address listed above.