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## **Amendment to the 2024 and 2025 Annual, MTW and Five-Year Plan**

### **Lakeland Housing Authority**

The Lakeland Housing Authority is amending its Annual, MTW, and five-year PHA Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, LHA will be converting to Project Based Vouchers under the guidelines of H-2019-09/PIH 2019-23, REV-4 and any successor Notices. LHA's conversion strategy will consist of a "RAD/Section 18 blend", as authorized by the Notice, where new Project-Based Vouchers activities need to be described in LHA's five-year PHA Plan

50075-ST, Section B.2, New Activities

#### **Demolition Disposition**

Dakota Park (aka Carrington Place Apartments): Though this amendment discusses the Dakota Park RAD conversion below, LHA is also considering the Section 18 Demolition and Disposition of the site as an alternative to RAD. The site consists of 40 units of which 20 are public housing units. The proposed action is based on the obsolescence of the units, as demonstrated by a Physical Needs Assessment report, prepared by Bureau Veritas and dated July 26, 2024. The estimated rehabilitation cost for Carrington Place Apartments exceeds \$7.9 million, which surpasses HUD's threshold for viability—set at 57.14% of the Total Development Cost (TDC) for non-elevator buildings. With the TDC for a new development in Lakeland, FL, ranging up to \$12.8 million, the high cost of required structural repairs, mold remediation, and system replacements at Carrington Place makes rehabilitation financially impractical, justifying HUD's approval for demolition due to obsolescence.

In response to this situation, the LHA plans to redevelop the site into a 100-unit mixed-income community. This new development will not only replace all demolished units but will also elevate the standard of affordable housing through sustainable and high-quality construction, reflecting LHA's commitment to revitalizing the community and enhancing the lives of its residents. The proposed redevelopment is planned to proceed regardless of whether the RAD conversion, Section 18 Demolition/Disposition action, or a blend of both strategies is ultimately selected.

#### **Project-Based Vouchers**

PHA Plan Requirements: *"If a PHA intends to use the PBV program, it must provide: 1) the projected number of PBV units, 2) their general locations, 3) the work it plans to do on the property or site, 4) how many units of PBV it is planning on adding to the site, and 5) how project-basing is consistent with its PHA Plan."*

LHA plans to use the PBV program for project-basing units at the following properties as part of a RAD/Section 18 blended conversion.

- Micro-Cottages at Williamstown
  1. Projected number of units: 38
  2. Location: 1450 Kennedy Boulevard Lakeland, Florida 33810
  3. Work plans to do on the property: The PBV units will be part of a "RAD/Section 18 blend" conversion project aimed at the preservation of the property. The property, built in 2018, is in excellent condition, requiring no renovations with the RAD conversion.

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4. The property consists of 48 units. As part of the RAD conversion project, 10 units will be RAD-PBV units and 38 will be non-RAD PBV units resulting from tenant protections vouchers (TPV) from the Section 18 action. All 48 units will be processed under the RAD program.
  5. Consistency with LHA Plan: The use of Project-Based Vouchers (PBV) at the Micro-Cottages at Williamstown aligns with the LHA's PHA Plan by supporting the preservation and repositioning of existing public housing. Through a RAD/Section 18 blended conversion, this project ensures the long-term affordability and sustainability of the units, consistent with LHA's goal to maintain and improve public housing stock.
- Renaissance at Washington Ridge
    1. Projected number of units: 86
    2. Location: 150 West 14th Street Lakeland, Florida 33810
    3. Work plans to do on the property: The PBV units will be part of a "RAD/Section 18 blend" conversion project aimed at the preservation of the property. Renovations will include kitchen cabinets, appliances, bathroom upgrades, flooring and painting throughout the units and air conditioning replacements. Exterior renovations will include exterior wall repairs, siding and painting and accessibility upgrades as needed.
    4. The property is a Mixed Finance Development consisting of 196 units, of which 108 are ACC (public housing) units. As part of the RAD conversion project, 22 units will be RAD-PBV units and 86 will be non-RAD PBV units resulting from tenant protections vouchers (TPV) from the Section 18 action. All 196 units will be processed under the RAD program.
    5. Consistency with LHA Plan: The use of Project-Based Vouchers (PBV) at Renaissance at Washington Ridge aligns with the LHA's PHA Plan by supporting the preservation and repositioning of existing public housing. Through a RAD/Section 18 blended conversion, this project ensures the long-term affordability and sustainability of the units, consistent with LHA's goal to maintain and improve public housing stock.
  - Dakota Park (Carrington Place Apartments)
    1. Projected number of units: 16
    2. Location: 1411 Kettles Avenue, Lakeland, Florida 33815
    3. Work plans to do on the property: The PBV units will be part of a "RAD/Section 18 blend" conversion project aimed at the redevelopment of the property.
    4. The property is a Mixed Finance Development consisting of 40 units, of which 20 are ACC (public housing) units. As part of the RAD conversion project, 4 units will be RAD-PBV units and 16 will be non-RAD PBV units resulting from tenant protections vouchers (TPV) from the Section 18 action. All 40 units will be processed under the RAD program. The units will be replaced with new construction units as part of a 100 units redevelopment effort.
    5. Consistency with LHA Plan: The use of Project-Based Vouchers (PBV) at Dakota Park aligns with the LHA's PHA Plan by supporting the redevelopment of existing public housing sites and replacement of existing units with new construction. Through a RAD/Section 18 blended conversion, this project ensures the long-term affordability and sustainability of the units, consistent with LHA's goal to maintain and improve public housing stock.
  - John Wright Homes and Cecil Gober Villas (Colton/Bonnet AMP)
    1. Projected number of units: 46

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2. Location 1: Elizabeth St, Lakeland FL. Location 2: 2130 Elizabeth St, Lakeland FL
3. Work plans to do on the property: The PBV units will be part of a "RAD/Section 18 blend" conversion project aimed at the preservation of the properties.
4. The properties are Public Housing sites consisting of 57 units. As part of the RAD conversion project, 11 units will be RAD-PBV units and 46 will be non-RAD PBV units resulting from tenant protections vouchers (TPV) from the Section 18 action.. All 57 units will be processed under the RAD program. The units will be substantially rehabilitated.
5. Consistency with LHA Plan: The use of Project-Based Vouchers (PBV) at the John Wright Homes and Cecil Gober Villas aligns with the LHA's PHA Plan by supporting the preservation and repositioning of existing public housing. Through a RAD/Section 18 blended conversion, this project ensures the long-term affordability and sustainability of the units, consistent with LHA's goal to maintain and improve public housing stock.

### **Conversion of Public Housing to Project-Based Rental Assistance of Project-Based Vouchers under RAD**

The Lakeland Housing Authority is amending its five-year PHA Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, PCC will be converting to Project Based Vouchers under the guidelines of H-2019-09/PIH 2019-23, REV-4 and any successor Notices. Upon conversion to Project Based Vouchers the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of H-2019-09/PIH 2019-23, REV-4; and H-2016-17/PIH-2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, LHA certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by LHA with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that LHA may also borrow funds to address their capital needs. LHA will also be contributing Capital Funds in the amount of \$1,300,000 towards the conversion.

Below, please find specific information related to the Public Housing Developments selected for RAD:

#### **Development #1**

<u>Name of Public Housing Development:</u>	<u>PIC Development ID:</u>	<u>Conversion type (i.e., PBV or PBRA):</u>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
<b><i>Twin Lakes Estates Phase I</i></b>	<b><i>FL011000006</i></b>	<b><i>PBV</i></b>	<b><i>N/A</i></b>
<u>Total Units:</u>	<u>Pre-RAD Unit Type</u>	<u>Post-RAD Unit Type</u>	<u>Capital Fund allocation</u>

<b>10</b>	(i.e., Family, Elderly, etc.):  <b>Elderly/Disabled</b>	(i.e., Family, Elderly, etc.):  <b>Elderly/Disabled</b>	of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)  <b>\$26,000</b>
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	<b>6</b>	<b>6</b>	
Two Bedroom	<b>4</b>	<b>4</b>	
Three Bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing Transfer Assistance):	(Explain any changes in in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted)		

The site complies with the Site selection requirements set for at 24 CFR § 983.57, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

**Development #2**

<u>Name of Public Housing Development:</u>  <b>Twin Lakes Estates Phase II</b>	<u>PIC Development ID:</u>  <b>FL011000007</b>	<u>Conversion type (i.e., PBV or PBRA):</u>  <b>PBV</b>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>  <b>N/A</b>
<u>Total Units:</u>	<u>Pre-RAD Unit Type (i.e., Family, Elderly, etc.):</u>	<u>Post-RAD Unit Type (i.e., Family, Elderly, etc.):</u>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total</u>

<b>14</b>	<b>General Occupancy</b>	<b>General Occupancy</b>	<u>number of public housing units in PHA, multiplied by total number of units in project</u>  <b>\$26,000</b>
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	<b>2</b>	<b>2</b>	
Two Bedroom	<b>8</b>	<b>8</b>	
Three Bedroom	<b>4</b>	<b>4</b>	
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing Transfer Assistance):	(Explain any changes in in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted)		

The site complies with the Site selection requirements set for at 24 CFR § 983.57, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

**Development #3**

<u>Name of Public Housing Development:</u>  <b>Micro-Cottages at Williamstown</b>	<u>PIC Development ID:</u>  <b>FL011000005</b>	<u>Conversion type (i.e., PBV or PBRA):</u>  <b>PBV</b>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>  <b>N/A</b>
<u>Total Units:</u>	<u>Pre-RAD Unit Type (i.e., Family, Elderly, etc.):</u>	<u>Post-RAD Unit Type (i.e., Family, Elderly, etc.):</u>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in</u>

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<b>48</b>	<b>General Occupancy</b>	<b>General Occupancy</b>	project)  <b>\$140,000</b>
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	<b>2</b>	<b>2</b>	
Two Bedroom	<b>46</b>	<b>46</b>	
Three Bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing Transfer Assistance):	(Explain any changes in in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted)		

The site complies with the Site selection requirements set for at 24 CFR § 983.57, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

**Development #4**

<u>Name of Public Housing Development:</u>  <b>Renaissance at Washington Ridge</b>	<u>PIC Development ID:</u>  <b>FL011000003</b>	<u>Conversion type (i.e., PBV or PBRA):</u>  <b>PBV</b>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>  <b><u>N/A</u></b>
<u>Total Units:</u>  <b>108</b>	<u>Pre-RAD Unit Type (i.e., Family, Elderly, etc.):</u>  <b>General Occupancy</b>	<u>Post-RAD Unit Type (i.e., Family, Elderly, etc.):</u>  <b>General Occupancy</b>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>  <b>\$250,000</b>

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Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	<b>36</b>	<b>36</b>	
Two Bedroom	<b>48</b>	<b>48</b>	
Three Bedroom	<b>22</b>	<b>22</b>	
Four Bedroom	<b>2</b>	<b>2</b>	
Five Bedroom			
Six Bedroom			
(If performing Transfer Assistance):	(Explain any changes in in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted)		

The site complies with the Site selection requirements set for at 24 CFR § 983.57, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

**Development #5**

<u>Name of Public Housing Development:</u>  <b>Dakota Park</b>	<u>PIC Development ID:</u>  <b>FL011000002</b>	<u>Conversion type (i.e., PBV or PBRA):</u>  <b>PBV</b>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>  <b>N/A</b>
<u>Total Units:</u>  <b>20</b>	<u>Pre-RAD Unit Type (i.e., Family, Elderly, etc.):</u>  <b>General Occupancy</b>	<u>Post-RAD Unit Type (i.e., Family, Elderly, etc.):</u>  <b>General Occupancy</b>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>  <b>\$500,000</b>
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance,

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			Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	<b>8</b>	<b>20</b>	Unit Reconfiguration
Three Bedroom	<b>5</b>		
Four Bedroom	<b>6</b>		
Five Bedroom	<b>1</b>		
Six Bedroom			
(If performing Transfer Assistance):	(Explain any changes in in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted)		

The site complies with the Site selection requirements set for at 24 CFR § 983.57, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

**Development #6**

<u>Name of Public Housing Development:</u>  <b>Colton/Bonnet (John Wright Homes and Cecil Gober Villas)</b>	<u>PIC Development ID:</u>  <b>FL011000001</b>	<u>Conversion type (i.e., PBV or PBRA):</u>  <b>PBV</b>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>  <b>N/A</b>
<u>Total Units:</u>  <b>57</b>	<u>Pre-RAD Unit Type (i.e., Family, Elderly, etc.):</u>  <b>General Occupancy</b>	<u>Post-RAD Unit Type (i.e., Family, Elderly, etc.):</u>  <b>General Occupancy</b>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>  <b>\$500,000</b>
<u>Bedroom Type:</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u>
Studio/Efficiency			



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One Bedroom	<b>37</b>	<b>37</b>	
Two Bedroom	<b>10</b>	<b>10</b>	
Three Bedroom	<b>10</b>	<b>10</b>	
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing Transfer Assistance):	(Explain any changes in in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted)		

The site complies with the Site selection requirements set for at 24 CFR § 983.57, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

**Resident Rights, Participation, Waiting List and Grievance Procedures**

Appended to this attachment:

- H 2019-09/PIH 2019-13, REV-4 Section 1.6.C & Section 1.6.D
- H-2016-17/PIH-2016-17

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**Significant Amendment Definition**

As part of the Rental Assistance Demonstration (RAD), LHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion.