



SEP 14 2018

U.S. Department of Housing and Urban Development
San Francisco Regional Office - Region IX
One Sansome Street, Suite 1200
San Francisco, California 94104-4430
www.hud.gov

espanol.hud.gov

Via Electronic Transmission Only

Joseph Villarreal
Executive Director
Housing Authority of the County of Contra Costa
3133 Estudillo Street
Martinez, CA 94553

Re: FHEO Front-End Civil Rights Review RAD Accessibility and Relocation Checklist
Las Deltas TOA Antioch Scat Site Renovation
Terrace Glen Apartments and Pinecrest Apartments

On September 06, 2018, the U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity (FHEO) disapproved the FHEO Front-End Civil Rights Review RAD Accessibility and Relocation Checklist for Las Deltas TOA Antioch Scat Site Renovation, comprised of Pinecrest Apartments, located at 1945 Cavallo Road, Antioch, CA 94509 and Terrace Glen Apartments, located at 107 W. 20th Street, Antioch, CA 94509.

This disapproval was based on an apparent disparity between the current need and expected demand for accessible units, and the proposed final distribution of accessible units. Based on the initial review of the original Accessibility and Relocation Checklists, the proposed final distribution of accessible units by bedroom size was weighted heavily towards one-bedroom units, whereas the current need and expected demand was weighted towards two-bedroom units. FHEO was concerned that this potentially created a situation where one-bedroom accessible units would be occupied by households not needing the accessible features while applicants requiring two-bedroom accessible units would remain on the waiting list for extended periods of time.

On September 12, 2018, the Housing Authority of Contra Costa County (HACCC) clarified that the waitlist data provided in the original Checklists was PHA-wide, and not specific to Las Deltas and Las Deltas Annex I. When FHEO learned that the waitlist was not specific to Las Deltas, and therefore not representative of the demand for accessible units at Las Deltas or at the sites to which assistance is to be transferred, FHEO examined if the accessible unit-related needs of current Las Deltas residents would be met by the proposed final distribution of accessible units across the Las Deltas portfolio, and FHEO examined if the overall demand for accessible units would be met by HACCC's portfolio of accessible units.

Accessibility

In order to assess if the accessible unit-related needs of current Las Deltas residents would be met by the proposed final distribution of accessible units across the Las Deltas portfolio, the overall number, and distribution, of UFAS-accessible units was gathered from the two checklists associated with this review, as well as those previously submitted and approved by FHEO as a part of the larger Las Deltas transfer of assistance:

Las Deltas Portfolio- UFAS Accessible Units				
Configuration	Las Deltas	Las Deltas Portfolio Post-Conversion	Las Deltas Post-Conversion Pinecrest only	Las Deltas Post-Conversion Terrace Glen only
0-bedroom	0	3	0	0
1-bedroom	7	29	2	0
2-bedroom	5	11	0	3
3-bedroom	0	1	0	0
4-bedroom	0	0	0	0
5-bedroom	0	0	0	0
Total	12	44*	2	3

*does not include the unassigned RAD allocations

The totality of UFAS-accessible units post-conversion will exceed the minimum of 5% of units accessible for individuals with a mobility impairment, and will exceed the minimum of 1% of units accessible for individuals with a vision impairment and 1% of units accessible for individuals with a hearing impairment. According to the checklist, of the total number of assisted units post-conversion resulting from the Las Deltas transfer of assistance (totaling 375 RAD units and PBV units), “at least 25 units will be accessible for persons with physical disabilities with an additional 14 accessible to persons with vision and hearing impediments. This far exceeds the current 12 accessible units at Las Deltas.” Based on this analysis, the accessible unit-related needs of all current Las Deltas residents will be met post-conversion, as the number of accessible units post-conversion will exceed the number of accessible units at Las Deltas, and as the minimum number of each type of accessible unit will be exceeded.

In order to assess if the overall demand for accessible units would be met by HACCC’s portfolio of accessible units, FHEO gathered data from the four Accessibility and Relocation Checklists dated January 04, 2018:

Post-Conversion		Current Resident Data		HACCC Portfolio	HACCC Waitlist Data	
Configuration	Las Deltas Portfolio Post-Conversion	Mobility-accessible units occupied by individuals needing the features	Vision/Hearing-accessible units occupied by individuals needing the features	"Disabled" Units**	Waitlist requesting mobility-accessible units	Waitlist requesting vision/hearing-accessible units
0-bedroom	3	0		4	0	0
1-bedroom	29	7		244	3	2
2-bedroom	11	5		69	16	8
3-bedroom	1	0		0	1	1
4-bedroom	0	0		0	0	0
5-bedroom	0	0		0	0	0
Total	44*	12		317	20	11

*Does not include the unassigned RAD allocations

**Does not include post-conversion numbers for accessible units

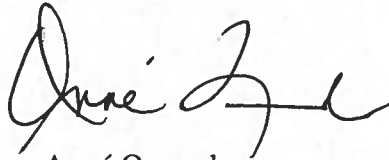
Based on this analysis, the overall HACCC-wide demand for accessible units (based on the waitlist numbers provided) will be met by the overall HACCC portfolio of accessible units.

Conclusion

Based upon FHEO's review of the Checklist, this Office approves the FHEO Front-End Civil Rights Review of the RAD Accessibility and Relocation Checklist for the Las Deltas TOA Antioch Scat Site Renovation.

If you have any questions, please contact Nathanael Hill, Equal Opportunity Specialist, at (415) 489-6541 or nathanael.r.hill@hud.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Anné Quesada". The signature is fluid and cursive, with a large initial "A" and a stylized "Q".

Anné Quesada
Regional Director
Office of Fair Housing and
Equal Opportunity