

Westlawn Relocation Plan

HOUSING AUTHORITY OF THE CITY OF MILWAUKEE

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I. Introduction

On September 28th, 2015 the City of Milwaukee and the Housing Authority of the City of Milwaukee (HACM) were awarded a \$30 million HUD Choice Neighborhoods grant to support a locally-driven, placed-based, comprehensive strategy that will transform the northwest side of Milwaukee into an inclusive community of opportunity with quality housing, schools, businesses, services, and amenities where people want to live, learn, work, shop and play. The CNI Transformation Plan brings together diverse resources to positively impact both the housing stock and the quality of life for the residents of the neighborhood.

The grant will enable the conversion of the CNI targeted neighborhood (from Sherman Blvd. to 76th St. and from Villard Ave. to Mill Rd.) into a vibrant, mixed-income community by stabilizing housing, improving access to existing retail establishments and creating new retail opportunity, improving transportation, improving parks, reducing the negative impacts of foreclosed properties, advancing public safety, and improving health, educational and other social outcomes.

Included in this broad initiative is the continued redevelopment of the western part of the Westlawn public housing development, the largest in the State of Wisconsin. Located in the Choice Neighborhood Implementation (CNI) target area on Silver Spring Dr. between 64th St. and 68th St, it is the centerpiece of the Westlawn Transformation plan.

The original Westlawn contained 726 units on approximately 75 acres on the northwest side of Milwaukee. The barracks-style buildings were constructed in 1952 and had been exhibiting a myriad of deficiencies from structural deterioration, water infiltration, and outdated utility systems to inadequate accessibility and design flaws. It was imperative to address the severely distressed buildings while continuing to provide low-income housing in the area.

In 2010 HACM applied for and received Low Income Housing Tax Credit (LIHTC) funding for Phase I of the Westlawn redevelopment. The existing buildings on the east side of the development were razed and replaced with high-quality mixed-income housing that would better serve the housing needs of the community. This phase of the redevelopment required the permanent relocation of 332 households. By 2013 the construction of single-family houses, townhouses and multi-family buildings was completed, and 250 families were relocated into the new “Westlawn Gardens”. Over \$82 million was invested into the award winning project that incorporated cutting-edge sustainable design, green building technology, public and retail

space, community gardens, and other amenities that make it an attractive and desirable place to live.

Phase II of the Westlawn redevelopment will leverage CNI grant funds to implement redevelopment of the balance of the site (the west side). There will be a total of 394 distressed units demolished and replaced with 706 on-site units and 2 units that are off-site but within the CNI target neighborhood. These will be a mix of single-family homes, town houses and multi-unit buildings which will mirror the design and functionality of the existing Westlawn Gardens. As on the east side of the development, their construction will promote economic diversity by the use of a combination of public housing units, LIHTC units, and market-rate rentals and homeownership units. Among the buildings planned is Victory Manor, a 60 unit multi-family building, of which 25%, or 15, of the units will have preferences for military veterans.

This redevelopment will necessitate the relocation of residents living in the 394-unit development (382 households at the time the grant was awarded). Because the new buildings won't be ready for re-occupancy for more than one year, the relocations will be considered permanent; however, the residents, who chose their right to return at the time of relocation, will be given first priority to return once the construction is completed. The relocation will occur in four phases, starting February 2016 and ending December 2017. (See Appendix 1)

Westlawn residents were involved in the planning of the relocation activities. Residents weighed in on the process at numerous Resident Organization and Resident Advisory Board meetings. Residents will have further input in their own relocation plan when meeting with the Relocation Advisors in individual sessions.

As successful relocations were executed in a number of previous HOPE VI and LIHTC projects, HACM has the experience, qualifications and confidence to undertake this critical relocation effort.

The Relocation Plan addresses how the needs of these residents will be met, from initial consultations to full re-occupancy of the new units. It describes specific steps HACM will take to minimize the adverse impacts of relocation for the residents who will be displaced, including policies for notification, relocation assistance, physical moves, staffing, re-occupancy, and the right to appeal.

All relocation activities provided will be in accordance with the Universal Relocation Act and Real Property Acquisition Policies Act of 1970, as amended (URA) (49 CFR Part 24) and are consistent with fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973.

Advisory services were provided in the development of this relocation plan by Maureen Thurman from HUD's Community Planning and Development division.

II Relocation Overview

In order to implement the redevelopment of Westlawn, all displaced households will need to be relocated to comparable dwellings with rights and protections provided under the URA.

HACM's relocation efforts are guided by a principal that prioritizes the best achievable outcome for each resident household. HACM staff seek to minimize household disruptions and make the transition as seamless as possible.

HACM plans to use a combination of resources to provide comparable dwelling units, relocation advisory services, case management, and the physical move of belongings. The residents will be consulted regarding their housing requirements and preferences, and counseled to identify and address any special needs such as translation services or accommodations.

The comparable dwelling units include other public housing developments, HACM non-subsidized developments, HACM's LIHTC developments, the private rental market and non-HACM owned subsidized developments. Additionally, Tenant Protection Vouchers (TPV) will be offered to eligible residents; these vouchers are similar to, and will be administered like Housing Choice Vouchers. As part of the relocation plan, residents were surveyed about their moving preferences. Of the respondents in the survey done for all affected residents, 245 households responded (64%):

24% would prefer to use a TPV to remain in the Westlawn neighborhood

24% would prefer to use a TPV in a neighborhood other than Westlawn

15% prefer another public housing unit

37% need more information before deciding

Through individual meetings with a team of Relocation Advisors, residents will be given sufficient information to make decisions that take into account their needs, preferences, necessary accommodations, and best interests for them and their family. The Relocation Advisors will assist the resident in creating their own individual relocation plan, which will be enforced through a signed Individual Relocation Agreement (IRA) (See Appendix 2).

Provisions for resident supportive services are included in the CNI grant to minimize the impact of the relocations effort; six (6) HACM Case Managers will assist residents to ensure that they have access to daycare, early childhood education, schools, transportation to jobs, etc. These

case managers will continue to provide services throughout the entire grant activity period, including the re-occupancy phase of the project.

The process to relocate residents encompasses providing notices, relocation advisory meetings, identifying comparable housing, assistance in securing utility services, the physical moving of belongings, and re-occupation for those who wish to return to the new buildings.

A General Information Notice (GIN) was sent to all residents on January 26th, 2016. This notice informs them of the overall project, the need to relocate them at some future date, their rights and protections under the URA, and the services that will be made available to them. (See General Information Notice Appendix 3)

Relocation Advisors will meet with the heads of households to explain all of the relocation options and types of assistance available, including, but not limited to, physical moving options and what resources are available. During one-on-one consultations, the advisors will also identify the needs and preferences of the residents, obtain contact information and best times they can be reached, and identify any requested accommodations or special needs.

Once options have been fully explained to the residents, and individual relocation plans have been formulated, residents will be given a list of comparable units, based on their needs and preferences. Once units have been identified, resident security deposits will be transferred to the new property manager (any additional deposits required will be paid by HACM).

Residents can physically move their belongings on their own, per the options provided under the URA, and be reimbursed for actual expenses or given a flat payment based on the number of rooms in their current unit. They can also opt to have HACM undertake the physical move at no cost to them.

Those residents who opted to return to Westlawn will be notified by Relocation Phase of the opportunity to return when the new units are completed. The same physical moving options are made available to them, and HACM will continue any supportive services needed for the return move.

Actual household moving costs will vary depending upon the relocation options chosen. however. HACM has estimated the entire relocation budget to be \$953,860.

Non-Discrimination Policy

HACM shall comply fully with Title VI of the Civil Rights Act of 1964, Title VIII and Section 3 of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974), Executive Order 11063, Section 504 of the Rehabilitation Act of 1974, and any legislation protecting the individual rights of residents, applicants or staff, which may subsequently be enacted.

The agency will reference Handbook 1378 that combines all statutory, regulatory and HUD guidance into a single reference source.

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook1378

III. Staffing and Contact Information

A. Staffing

The Senior Asset Manager of HACM will serve as the Relocation Coordinator and oversee all operations under this Plan. The Relocation Coordinator will supervise the entire relocation process from the issuance of notices to re-occupancy at the project's completion. Along with the team of Relocation Advisors, the Coordinator will work closely with on-site management staff to provide notifications, housing search counseling, data tracking and other relocation services needed for the successful rehousing of residents. Relocation staff persons have participated in HUD relocation training to ensure adherence to and the proper execution of URA policies.

Relocation Advisors will conduct outreach and assessment of needs, and facilitate the creation of Individual Relocation Agreements (IRA). They will work with the residents throughout the entire relocation process to ensure access to eligible benefits and services, remove barriers to successful relocation, and coordinate physical moves. They, along with the Relocation Coordinator and on-site management staff, will ensure that proper records are kept on all relocation activities.

Housing Choice Voucher (HCV) program staff, including Certification Specialists, Lease and Contract Specialists and Inspectors, will be responsible for assessing eligibility and issuing the Tenant Protection Vouchers (TPV). They will provide outreach and training for new voucher holders and administer all related program requirements.

The Community Services division (COS) of HACM will coordinate the Case Managers who will provide supportive services to the residents in an effort to reduce or eliminate barriers to successful relocation.

Homeownership Program staff are available for homeownership advisory services and referrals for residents considering purchasing a home, either through HACM's Homeownership Program or on the private market.

The on-site management staff are available to explain the relocation processes and timelines, and to make internal referrals that will ensure resident needs are being addressed under this plan. Staff persons at the development office are available to residents for questions, referrals and packing materials.

As part of CNI and as part of HACM's ongoing commitment to the provisions under Section 3 of the Housing and Urban Development Act of 1968, a Westlawn resident will be hired (to the greatest extent possible) as a Relocation Assistant to help with the relocation process. Tasks will include, but are not limited to, distribution of packing materials, assistance with packing and unpacking of personal belongings, and assistance with coordinating physical moves.

B. Contacts

Relocation Coordinator

James Eigenberger
Senior Asset Manager
(414) 286-5126
jeigen@hacm.org

Housing Choice Voucher Program (Section 8)
(414) 286-5650

Community Services (COS)
(414) 286-5678

Westlawn Management Office
(414) 286-8868

Homeownership Program
(414) 286-5043

Media Inquiries & Communication
Paul Williams
(414) 224-0528
paul.williams.@hacm.org

HACM Website & Online CNI Information
www.hacm.org

IV. The Relocation Plan

Relocating residents encompasses everything from notifying the affected households, counseling them for needs and eligibility of assistance, case managing for barriers, identifying comparable housing, and transferring security deposits and establishing utility services to physically moving personal belongings. How these components will be undertaken is detailed in this section.

A. Resident Notification

Notification Process

All affected residents will be provided written notices by personal delivery or via certified and registered first-class mail, return receipt requested. Each notice shall be written in plain, understandable language. Persons who are unable to read and understand the notice will receive appropriate assistance to ensure effective communication.

Types of Notices

1) The General Information Notice (GIN)

The GIN is an advisory notice sent to all affected residents explaining the project, activities that are planned, assistance that is available, and potential relocation payments that are available under the URA. Moreover, it advises the residents of the following:

- They should not move before receiving a notice indicating eligibility for relocation assistance.
- They will receive information about the relocation assistance they are eligible for and the procedures are for receiving assistance.
- They will not be required to relocate without receiving a 90-day Notice-to-Vacate.
- They will not be required to move unless at least one comparable dwelling unit has been made available.
- They will receive reasonable relocation advisory services, including relocation referrals and other necessary services.
- They must continue to pay rent and meet all other lease obligations in order to be eligible for relocation payments or assistance under the URA.
- They have a right to appeal HACM's determination of eligibility for URA assistance.

- They have a right to return to the project
- They are provided with contact information for assistance and with questions

The GIN notice includes a copy of the HUD brochure, *Tenants Displaced from Their Homes* that describes the resident's relocation benefits. (A copy of this brochure is attached as Appendix 4)

2) Notice of Eligibility for Relocation Assistance (NOE)

The NOE advises affected residents about their eligibility to receive relocation assistance. (See Appendix 5) It is specific to the household and outlines their particular options and benefits. The notice will advise the residents of the following:

- Their eligibility for relocation assistance and the effective date of their eligibility
- The relocation assistance services that are available, the estimated amount of assistance for which they may be eligible, and the procedures for obtaining the relocation assistance
- The resident's appeal rights and procedures
- Right to return when the project is complete
- Comparable available units

3) 90 Day Notice-to-Vacate

This notice will advise the residents of the specific date by which they must vacate the property.

4) Eviction Notice

An eviction notice will be given if substantial lease violations exist and after Case Managers have attempted to resolve the issues. HACM will not give eviction notices in order to circumvent the regulatory services and protections afforded to the residents.

If, after proper notification and after every reasonable attempt to assist the resident has been made, a household refuses to vacate the unit by the required date, HACM will seek legal redress per its eviction procedure and through the Milwaukee County court system. All evictions will comply with the URA.

5) Project Update Notice

If the project undergoes changes to its schedule, affected residents will receive modified relocation notices or development updates as they become available.

B. Eligibility for Relocation Assistance

Displaced persons are eligible for relocation assistance under the URA. Because the demolition of the buildings and subsequent new construction will take more than one year to complete, all of the residents will need to be “permanently relocated” per HUD definitions, and are thus entitled to relocation protections and assistance under the URA.

Undocumented immigrants and aliens not lawfully present in the United States are not eligible for relocation assistance, unless such ineligibility would result in exceptional hardship to a qualifying spouse, parent or child.

Relocation Advisors will explain eligibility status and types of assistance to each resident during the initial consultation process. Households may make a request to split into multiple households, but the decision to extend relocation assistance and rights to anyone other than the original head of household and others living with them will be made at the discretion of the Relocation Coordinator and only when remedies and resources are available. Only the original head of household has the right to return on priority basis to Westlawn upon completion.

C. Identification of resident needs and preferences

Relocation Advisors will meet with residents as soon as possible to establish resident needs and preferences. In addition to the number of bedrooms the family requires and the area of town they prefer, other factors are explored such as proximity to schools, building amenities (i.e. elevator, parking, pet policies) and access to public transportation. Clarifying needs and preferences helps the resident develop confidence in their choices and provides guidance when looking for comparable units.

D. Types of assistance available

All eligible residents who are relocated in the context of this funded project will receive the appropriate services and benefits required under the URA.

1. Housing options

Another PH Unit

HACM operates 18 other public housing developments (3,183 units) to which residents can be relocated. HACM currently has 1, 2, 3, and 4 bedroom vacancies available across these developments and available units will be offered as they become available. The average vacancy rate across all developments is 4%, which is about 127 vacancies per month.

By choosing another PH unit, the resident will have no additional applications or fees, and, unless in a scattered site unit, no establishment of utilities. Additionally, their rent calculations would remain the same. However, although the developments are scattered throughout the city of Milwaukee, the resident may have fewer choices regarding the neighborhood in which they wish to reside than if they went into the private rental market.

Any Westlawn resident, regardless of household income, is eligible for this option.

HACM Mixed-Finance Unit

Residents who meet income and occupancy standards can choose to lease a unit in one of HACM's ten (10) mixed-finance developments. These developments have designated units for low-income residents. Rents for these units are calculated at 30% of adjusted gross income.

Tenant Protection Voucher (TPV)

Residents who are determined income eligible for the Housing Choice Voucher (HCV) program may select to receive a TPV and rent any unit in the private market that participates in the program and adheres to its guidelines. Rent is calculated as 30% of adjusted gross income.

This voucher gives the resident greater relocation choices as over 1,500 property owners participate in the program (portability to another city which operates a HCV program is also

allowed). The voucher stays with the tenant as long as they remain income eligible and are compliant with program requirements.

Under this option the resident would need to complete an application process and establish a relationship with a new property manager. They also may be required to establish new utility services which can be done with the assistance of the Relocation Advisor.

Additionally, HACM owns and manages market-rate developments throughout the city. Residents choosing this option may be subject to re-screening to meet the requirements of the development.

Homeownership

Through partnerships with area counseling and financial literacy agencies, HACM has encouraged homeownership to its residents as part of its ongoing supportive services model. The availability of housing counseling agencies, first-time home-buyer grants and the potential use of Replacement Housing Payments (RHP) makes this option a possibility for higher-income residents. (See page 17 for explanation of RHP)

Private Market

Based on affordability and credit worthiness, residents are encouraged to consider transitioning from public housing to homeownership as a means to self-sufficiency. This option would most likely apply to households with income that exceeds the threshold for subsidy, but also have low debt and good credit. Homeownership staff are available to provide resources, referrals and support to residents exploring this option.

Section 8(y) Homeownership

Residents receiving a TPV may opt to use the subsidy to purchase a house under HACM's 8(y) program. Buyers must complete home-buying counseling and choose a property that meets the Housing Quality Standards (HQS) under the HCV program. The buyer pays their portion of the mortgage and HACM pays the subsidized portions to the lender. Buyers must have at least \$15,000 gross annual earned income and be employed an average of 30 hours per week (unless elderly or disabled).

Section 32 Homeownership Program

Affected residents under 80% of County Median Income (CMI) may be eligible to receive up to \$25,000, in the form of a forgivable second mortgage, to bridge the gap from their maximum affordability to the appraised price of a HACM-owned scattered sites house for sale. In addition to potential assistance with the purchase price, the buyer gets a fully rehabbed home with no major foreseen expenses over the next seven to ten years. They also pay no property tax for the year in which the house was purchased.

Residents work with local housing counseling agencies for home-buying classes and to prepare their credit for a home loan. In addition to any grants and first-time homebuyer programs through lenders, the lump sum RHP can be used for a down payment. (See below for explanation of RHP)

As part of HACM's mission to support residents in their effort to become self-sufficient, it encourages residents to explore the possibilities and opportunities available to them to become first-time home-buyers.

Other Affordable Housing

There are 137 project-based HUD subsidized developments in Milwaukee and the surrounding suburbs. A comprehensive list of affordable private rental units will be provided to residents along with the supportive services available under the URA and this Relocation Plan. This option might be best for affected residents who wish to leave public housing and are over-income for a voucher or other housing subsidy. The more desirable areas and complexes may have waiting lists, and residents may be subject to application processes, background and credit checks.

2. Replacement Housing Payment (RHP)

The RHP is intended to cover any increase in the resident's monthly housing costs (rent and utilities), at a comparable unit, that exceeds what they would pay if they had not been required to relocate and were still living in public housing at Westlawn. This is also known as a "gap" payment.

The monthly RHP is calculated by comparing the rent and utilities at the existing unit with a comparable unit. The amount of the RHP is the difference a tenant has to pay to meet the obligations at the new, comparable unit.

Payment of the RHP will be made to the resident in monthly installments beginning with the first rent payment. The duration of benefits is 48 months of assistance.

A resident who receives a RHP may also use it as down payment assistance for the purchase of a single family house – through the private market or through HACM – in which case the allotment is dispersed in a one-time lump sum. Calculation of the lump sum is the difference of current rent and utility costs and that of a comparable unit (one month of RHP) times the maximum allotment of 48 months. This is dispersed at the time of closing.

3. Relocation Advisory Services

Residents will be contacted as soon as possible (per Relocation Phase) for a one-on-one meeting with a Relocation Advisor for initial assessment of their needs and preferences. Advisors will attempt to identify any barriers to relocation, or any Section 504 accessibility accommodations required. They will inform residents of their rights and protections under the URA and explain the housing options available to them.

The advantages and disadvantages of each housing option will be explained, and any questions answered. Residents will be asked to certify with their signature that they received and understood the options available to them, a copy of which will be given to the resident and the original retained in personal relocation records.

After initial consultation, and after all of the residents' concerns have been addressed, the residents will be asked to choose their relocation options, choose if they would like to return to Westlawn when the project is completed, and then to sign the Individual Relocation Agreement (IRA). The signed IRA will be the impetus for the residents housing search activities and be used by HACM in planning forthcoming relocation activities.

Additional services available throughout the relocation process include, but are not limited to:

- Language translation services
- Explanation of the dislocation allowance
- Calculations of benefits
- Identification of comparable units
- Provision of area maps and information about neighborhoods
- Site tours
- Transportation - provided through bus tickets, cabs, and mileage reimbursement

- Packing and unpacking of belongings will be provided by the contracted movers, if requested
- Assistance in the establishment and/or transferring of utilities
- Assistance registering children in school or day care
- Setting up appliances
- Scheduling movers

All affected residents are eligible for, and are encouraged to avail themselves of the services provided by the Relocation Advisors and the Case Managers to ensure successful transition to a comparable dwelling.

4. Security Deposits

HACM will provide security deposits as part of the relocation benefits. If the resident relocates to another HACM public housing unit, the deposit will simply transfer to that unit. For residents moving to the private housing market and/or using a TPV, HACM will forward the deposit plus any additional deposit required to the new property manager, with the contingency that the deposit be returned to HACM at the end of tenancy.

5. Appliances

Residents who choose to move into another HACM property will be provided with a stove and a refrigerator. If the new location does not have appliances, the residents can take their existing stove and refrigerator with them.

E. Identification of comparable housing

Every effort will be made to assist residents by explaining the housing options available to them and helping them to find permanent housing. Using the resident needs and preferences established during consultation as a guide, the Relocation Advisor will identify a minimum of one (1) comparable unit and provide a listing of addresses and contact information to each tenant in writing.

In addition to meeting the bedroom size required and the financial means of the resident, comparable units are defined as being functionally equivalent to the existing unit – not necessarily exactly matching the current unit. Additionally, comparable units are decent, safe and sanitary, are vacant and available to rent, are reasonably accessible to one's place of

employment, are generally well located in respect to public and commercial facilities, are free of serious health violations or adverse environmental conditions, and are in compliance with federal, state and local fair housing regulations.

If requested, the Relocation Advisors can arrange site visits and assist with transportation to view potential units. Accessibility features must be comparable to what the resident has currently; if necessary, and in its sole discretion, HACM may pay to install a feature or remove a barrier.

All units will be reviewed by staff prior to being offered to residents to ensure they are decent, safe and sanitary and meet the definition of “comparable”.

Once suitable housing has been selected, security deposits will be transferred and a move-out date established. Relocation Advisors remain available to assist with the establishment or transfer of utility services, scheduling the move, and other supportive services. Payment allotment dispersals are made after the resident has vacated the unit.

F. Physical Moving Assistance

Affected residents will be given three physical moving assistance options: HACM will undertake the move, the resident can move themselves and be reimbursed for their actual expenses, or the resident can move themselves and receive a fixed payment based on the number of bedrooms.

Regardless of the option chosen, HACM will provide moving boxes, tape, shrink-wrap and markers for packing belongings. Residents are expected to pack on their own unless they request an accommodation (i.e. elderly, disabled).

1. HACM Contracted Movers

HACM will undertake the physical move by contracting with professional movers at no cost to the resident. The Relocation Advisor works with the resident to coordinate and schedule the move. If a resident chooses this option, they are entitled to a one-time dislocation allowance of \$100, to be mailed to the resident at their new address after the completed move.

2. Reimbursement for Moving Expenses

Any displaced residential occupant is entitled under the URA to actual and reasonable moving and related expenses. These expenses may include:

- Transportation of the affected resident and personal property
- Transportation costs for a distance up to 50 miles
- The expenses of packing and unpacking of personal belongings
- Reconnection of utilities including gas, electric, phone, and cable services, if the resident had active services at the time of the scheduled move
- Mileage reimbursement at \$0.55 per mile.
- The advance loan payment for a moving vehicle if the resident presents a copy of a rental agreement that shows the deposit for a rental truck or trailer, HACM may advance a loan which will be deducted from the reimbursement
- Down payments to establish connection fees
- Storage of appliances if not available at the new unit
- Any other moving related expenses determined eligible by HACM

To receive reimbursement for actual and reasonable moving costs, residents must submit a claim within 18 months of the date of the move. The HUD 40054 form, “Residential Claim for Moving and Related Expenses” will be used. A resident may request assistance from relocation staff with filling out this form. Claim for reimbursement will be subject to review and approval by the Relocation Coordinator.

Affected residents may waive their rights to a relocation payment by refusing to file a claim for the payment and/or by signing a written waiver which describes the specific monetary assistance waived and the pertinent law and regulation under which it is available, and by indicating that the person understands that, absent the waiver, they cannot be displaced unless provided the prescribed assistance.

3. Fixed Moving Expenses Allowance

Residents may choose to make their own moving arrangements and are entitled to a fixed allowance based on the number of rooms of furniture. HACM will assist residents in determining the amount for which they are eligible. If requested, HACM will consider payments for an additional room if the resident has a special need, such as medical equipment or a piano, or an inordinate amount of storage.

1 Room	2 Rooms	3 Rooms	4 Rooms	5 Rooms	6 Rooms	7 Rooms	8 Rooms
\$550	\$730	\$935	\$1,140	\$1,350	\$1,560	\$1,765	\$1,975

https://www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm

In order for HACM to sufficiently plan for and coordinate all the physical moves required under this Plan, residents will be asked to choose a moving option on the Physical Move Options form. They will retain a copy and the original will be kept in their relocation file. (Appendix 6)

G. Relocation Budget

The moving costs are based on contracting bids received and are per bedroom size. It is estimated that 72% of residents will be re-occupying the new building and will require a second physical move

Moving Costs	Out	Return
1 Bedroom	\$66,900	\$48,200
2 Bedroom	\$137,500	\$99,000
3 Bedroom	\$80,400	\$58,000
4 Bedroom	\$26,000	\$18,700
Total	\$310,800	\$223,900

Other associated costs with the execution of the Relocation Plan are estimated in the table below. HACM has allocated these funds from the CNI grant to ensure permanent housing for all of the affected residents.

Move outs	\$310,800
Returns	\$223,900
Contingency	\$25,000
Packing Material	\$22,200
Security Deposits	\$182,900
Utilities	\$7,300
Transportation	\$3,000
Staffing	\$103,760
RHP	\$75,000
Total	\$953,860

The Relocation Coordinator will ensure that relocation activities are conducted in compliance with the URA and regulations set forth at 49 CFR Part 24.

V. Resident Return and Re-occupancy Policies

At the time of project completion, all residents who have opted to return and are lease compliant may return to Westlawn as part of the Westlawn Transformation project. HACM maintains a “No Screening upon Return” policy with existing residents.

The onset of notifications to return will be receipt of the Occupancy Permit by the City of Milwaukee. Notices will be sent via certified mail to the last known address of each resident who has elected to return to the new site. The priority to return will be given to residents per Phase, per the order they moved out and per bedroom size available.

It is important to note that market rate and affordable units will be constructed alongside the replacement housing units, and that the residents’ priority rights to return apply only to the replacement housing units.

Once all the original residents return, HACM will begin to accept families who are on the waitlist to fill any remaining units.

VI. Appeals Process

Residents who are subject to relocation are entitled to request a review of any HACM determination concerning eligibility for relocation benefits, the amount of a relocation payment, and/or the adequacy of the housing to which the resident was referred.

At the time that the relocation assistance is offered, staff will inform the resident of the relocation appeal procedure. A resident will have 60 days after the receipt of a written offer of relocation benefits to file an appeal. The resident can request assistance from the agency in writing the appeal. The appeal must be delivered to the Westlawn Management Office within 60 days.

Upon receipt of the written appeal, a relocation dispute meeting between the resident, the Relocation Coordinator, and the Westlawn property manager will be scheduled within 10 business days. Residents may be represented at the meeting by a person of their choice and at their own expense. Interpreters will be provided upon request. A written decision will be issued by the Relocation Coordinator within ten (10) business days.

If the matter cannot be resolved at the relocation dispute meeting, the resident has five (5) days from the receipt of the written decision by the Relocation Coordinator to file an appeal with the Public Housing Review Board consistent with the Resident Grievance Procedures. (See HACM Grievance Procedures Appendix 7)

If the tenant is dissatisfied with HACM's determination on the appeal, further redress can be sought through the courts.

Appeals regarding relocation can only be based on a dispute about the level of relocation assistance and not on the requirement to vacate the unit. If a resident is uncooperative and refusing to vacate by the end of their time allotted, HACM will pursue eviction action per its standard eviction policy.

VII. Record Keeping

HACM will maintain records on the affected tenants as a part of the relocation plan as required by the URA. Files shall include, but not be limited to:

- All persons occupying existing Westlawn units before relocation activities begin
- Resident information that includes name, sex, age, race/ethnicity, disability (if applicable), relationship to head of household, estimated income, certification of legal residence/citizenship
- Description of the current unit
- Documentation of income
- Rent and utility costs for the displacement unit, comparable unit and replacement unit.
- Copy of all required notices: General Information Notice (GIN), Notice of Eligibility/90-day Notice-to-Vacate, and copies of return receipt and/or a certification of hand delivery
- Identification of resident needs and preferences
- Dates of all contact with the residents and advisory services provided
- Unit referral data that includes: when and where residents were referred to comparable units, dates of referrals, date of unit availability, reason a unit was declined by resident, unit inspection reports to include approval of unit as decent, safe and sanitary
- Moving cost estimate
- Copies of all relocation claim forms and supporting documents
- Evidence of payment and evidence of subsidy if applicable
- Security deposits made on behalf of relocated residents
- Amount of deposits returned to HACM upon completion of relocation tenancies in the private market
- Actual costs of contracted moving companies
- Actual payments made to residents for moving expenses, including transportation
- Documentation of why a claim was not made (i.e., resident moved prior to notice, failed to provide information necessary to complete relocation benefit claim)
- For tenants who move to homeownership: proof of down payment assistance, purchase agreement, closing statement/escrow agreement, copy of recorded deed
- Documentation of all hardship claims, if any, and the agency's determination (persons not lawfully present in the US)

- If a tenant is evicted, all documents that show eviction for cause
- If a tenant was not a legal occupant, the documentation that supports the determination that they were not a legal resident/occupant of the property or unit
- A copy of any appeals or complaints that are filed with the agency, and the agency's response

As required by HUD relocation policies, resident file folders will be kept confidential and stored in a centralized, accessible location for a period of three years, but no less than, the later of:

- 1) Three years from the date by which all payments have been received by persons displaced for the project
- 2) The date the project was completed (the DOFA, or Date of Full Availability of the last unit completed)
- 3) The date by which all issues resulting in litigation, negotiation, audit, or other action were resolved.

VIII Certification

The URA (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR part 24 apply to acquisition of real property and displacement of persons from real property occurring as a direct result of acquisition, rehabilitation or demolition of real property, for a project that receives federal financial assistance, including Section 8 PBV assistance or PBRA. For purposes of the URA, the term “project” is defined at 49 CFR 24.2(a)(22).

By submission of this plan, HACM hereby certifies that URA requirements will be implemented in compliance with all applicable fair housing and civil rights laws, including but not limited to, Title VI of the Civil Rights Act of 1964 Section 504 of the Rehabilitation Act of 1973, and the obligation to affirmatively further fair housing.

Pursuant to Title VI, HACM will take reasonable steps that ensure meaningful access to programs and activities by persons who, as a result of national origin, have limited English proficiency (LEP).

No resident will be subject to a permanent involuntary displacement. Any family temporarily relocated due to rehabilitation or construction shall have a right to return to the project.

No households will be displaced or made to permanently relocate as part of the conversion, nor will they be subject to a rent increase as a result of the conversion.

Tony Pérez

Executive Director, HACM

Date

Glossary of Terms

Choice Neighborhood (CN) - A plan that transforms distressed HUD housing and addresses the challenges in the surrounding neighborhood. The program is designed to catalyze critical improvements in neighborhood assets, including vacant property, housing, services and schools.

Choice Neighborhood Implementation (CNI) - Choice Neighborhoods Implementation Grants support those communities that have undergone a comprehensive local planning process and are ready to implement their “Transformation Plan” to redevelop the neighborhood

Comparable Dwelling - Housing that is offered to a relocating family that is comparable in size and amenities to the unit being demolished.

Gap Payment – Another term for the Replacement Housing Payment (RHP). It is the “gap” between what the tenant is currently paying and what they will need to pay at a new location (not to exceed the maximum payment standard).

HOPE VI – A HUD program to revitalize severely distressed public housing.

HUD - US Department of Housing and Urban Development – The federal agency that provides funding and administration of government-subsidized housing and development activities such as public housing and the CNI grant.

Low Income Housing Tax Credit (LIHTC) - Gives incentives for the utilization of private equity in the development of affordable housing. Units or properties developed with LIHTC are income restricted. Tenants must not have income over 60% of CMI in order to be able to reside in them.

Mixed-Finance Development – Units developed with the mix of public, private, and non-profit funds. These developments have a mix of designated units based on income and are designed to promote economic diversity.

Replacement Housing Payment (RHP) – The Replacement Housing Payment makes up the difference in housing costs between the dwelling unit the resident is being displaced from and the housing cost for the actual unit a displaced household moves to, or the unit the agency identifies as the comparable unit (whichever is lower). Housing cost is the monthly rent and estimated average utility costs of the dwelling. For public housing residents, the housing cost is the calculated rent and utility allowance based on the current rent policies in place, generally

30% of the tenant's average adjusted monthly income. The RHP is calculated to cover the cost differential for 48 months in the State of Wisconsin.

Tenant Protection Voucher (TPV) - A rental subsidy for standard-quality units that are chosen by the tenant in the private market. To the voucher holder, they are indistinguishable from Housing Choice Vouchers.

Uniform Relocation Act (URA) – The federal legislation that governs rights and benefits of households forced to move due to activities utilizing federal funding.

Appendices
