

Assessment of Fair Housing

St. Tammany Parish &
City of Slidell

FINAL REPORT

January 4, 2018



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Prepared for
St. Tammany Parish Department of Health and Human Services
City of Slidell Planning Department

Prepared by
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Table of Contents

I. Cover Sheet	1
II. Executive Summary	2
III. Community Participation Process	5
Public Comments on Draft AFH.....	13
IV. Assessment of Past Goals, Actions and Strategies	21
V. Fair Housing Analysis.....	26
A. Demographic Summary.....	26
B. General Issues	26
C. Publicly supported housing analysis	40
D. Disability and Access Analysis	45
E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis	50
F. 1,250 Units or fewer PHA Insert	53
G. \$500,000 or Less Local Government Insert	53
VI. Fair Housing Goals and Priorities.....	66

I. Cover Sheet

Complete the cover sheet with all requested information. The official authorized representative of each program participant must print their name, indicate which program participant they are signing on behalf of, state their position with the program participant, and sign and date the certification. In order to complete this document, download the document from the User Interface. Once it has been completed and signed, upload the document to the "Supporting Documents" page of the User Interface.

All joint or regional participants are bound by the certifications, except that some of the analysis, goals, or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

1. Submission date: January 4, 2018
2. Submitter name: St. Tammany Parish Government
3. Type of submission (e.g. single program participant, joint submission): Joint Submission
4. Type of program participant(s) (e.g. consolidated plan participants, PHA): Consolidated Plan Participants
5. For PHAs, Jurisdiction in which the program participant is located: NA
6. Submitter members (if applicable): NA
7. Sole or lead submitter contact information:
 - a. Name: Patricia P. Brister
 - b. Title: Parish President
 - c. Department: St. Tammany Parish Government
 - d. Street address: P.O. Box 628
 - e. City: Covington
 - f. State: LA
 - g. Zip code: 70434
8. Period covered by this assessment: 2018 - 2022
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R §§5.150-5.180 or comparable replacements regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.425(a)(1), 570.487(b)(1), 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certifications, except that some of the analysis, goals or priorities included in the AFH may only apply to the an individual program participant as expressly states in the AFH.

Note: Signature pages are included as separate attachments to the document.

_____ (Signature) _____ (Date)

Allyson Villars, Director, Dept. of Health and Human Services, St. Tammany Parish

_____ (Signature) _____ (Date)

Tara Ingram-Hunter, Planning and Zoning, City of Slidell

12. Departmental acceptance or non-acceptance:

_____ (Signature) _____ (Date)

Patricia P. Brister, Parish President, St. Tammany Parish Government

II. Executive Summary

Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

St. Tammany Parish is Louisiana's fastest growing parish: it has risen 25% in population since 2000. Its high performing public school system, abundance of outdoor recreation opportunities and proximity to major job centers in New Orleans and Baton Rouge have attracted households of all types. This growth has accelerated in the wake of major natural disasters that have struck south Louisiana in the last fifteen years, displacing residents from their homes in neighboring parishes.

Process and Analysis

St. Tammany Parish Government's Department of Health and Human Services (DHHS), in partnership with the City of Slidell (the City), engaged consulting firm Asakura Robinson to assist DHHS and the City in performing analysis and conducting a comprehensive community engagement process in support of completion of the joint AFH. Data analysis conducted for this report included detailed examination of the AFFH tables and maps provided by HUD via the online AFFH tool; analysis of census data on housing costs, cost burden, vehicle availability, and household income distribution; examination of St. Tammany Parish GIS resources related to public services, public facilities, school catchment areas, health facilities, and growth management areas to relate these to fair housing issues; and analysis of the survey results collected through the community engagement process.

The engagement process included two public meetings, three focus groups, three stakeholder meetings, numerous individual key stakeholder meetings, tabling at community events, and a survey that generated 272 responses. DHHS and the City of Slidell engaged social service providers, housing developers, transportation officials, educational and workforce development providers, and neighborhood leaders to discuss fair housing issues and establish goals for reducing discrimination,

improving housing condition, increasing access to opportunity, and meeting housing needs in St. Tammany Parish and the City of Slidell.

Contributing Factors

The results of this process have revealed that the parish's housing market does not meet the needs of all its residents, and that classes protected under the Fair Housing Act do not all share equitable access to opportunities. Economic, social, policy and environmental factors have constrained the availability of diverse and affordable housing choices. Major contributing factors to these challenges are:

- **NIMBYism:** There was a near-universal opinion among stakeholders that community opposition and NIMBYism is a reason why affordable housing and integrated communities are difficult to achieve in St. Tammany Parish and the City of Slidell. Many St Tammany Parish residents moved to get away from overdeveloped areas and therefore NIMBYism is not uncommon for development in general. In our survey of 272 respondents, 55% of 41 black or African-American respondents reported having difficulty finding safe, quality housing in a neighborhood they could afford, compared to 34% of all respondents. 36% of the 41 black respondents also reported experiencing housing discrimination.
- **Property Maintenance Code:** The Parish does not have a property maintenance code and so cannot enforce property condition violations against landlords. The City of Slidell, however, does have a property maintenance code and conducts active enforcement of violations.
- **Access to Opportunity Due to High Housing Costs:** The cost of housing in St. Tammany Parish and Slidell is high. Based on American Community Survey 2011-2015 data, approximately half of renters and one-fifth of owners in St. Tammany Parish and Slidell are cost-burdened, and local market data shows that costs continue to rise. The engagement process revealed that ALICE (Asset Limited Income Constrained Employed, as defined by United Way of Southeast Louisiana) residents often must live outside the Parish and commute in due to high housing costs, and low-income families tend to live in generational households because younger residents cannot afford to move into their own homes. The prevalence of housing located in floodplains further increases costs, due to the expense of flood insurance to homeowners and landlords.
- **Location and Type of Affordable Housing:** Market-based affordable housing in the Parish and in Slidell is often in poor condition and located far from services and jobs, while subsidized housing is difficult to find and is often located on "leftover" tracts of land that are also hard to access. Because there is limited public transportation in the Parish, challenges for getting to jobs and education/training are amplified by the cost of needing to own a car. Increasing the amount of mixed-use and mixed-income development located near services, jobs, and education/training sites would help remove this burden.
- **Availability of Public Transportation:** St. Tammany Parish and Slidell are served only by a demand-response service (STAR Transit) that needs to be scheduled ahead of time and costs between \$3 and \$8 per round trip. The service is constrained by the number of vehicles available; while improved scheduling practices have increased the number of rides the

service is able to provide, people who depend on the service may still not be able to receive a ride at the time it is needed (e.g. to get to a doctor's appointment, job, training).

- **Access to Health Care, Especially Mental Health Services:** Mental and behavioral health was mentioned by many stakeholders as an area where the Parish and Slidell are under-resourced after the closure of Southeast Hospital in 2012; many homeless individuals have mental health challenges that prevent them from accessing housing and jobs, and workforce development professionals report difficulty finding resources for job seekers or community college students who have mental health challenges.
- **Resources for Affordable Housing Development:** Resources for affordable development are difficult to secure in St. Tammany Parish for several reasons. One is the prevalence of floodplains and wetlands in the area that constrains the availability of HUD funding. Another is the overall prevalence of affluent households that decreases the parish's competitiveness for LIHTC funds based on the State's Qualified Action Plan.
- **Maintenance Challenges for Aging Housing:** The overall availability of publicly supported housing in the Parish and the City of Slidell is low, meaning that many lower-income and cost-burdened households live in aging and other less-desirable developments that have issues with housing conditions.

Goals and Priorities

Goals and priorities were crafted to respond to the Contributing Factors based on data indicators and community input on current initiatives, projects, and programs, as well as input on areas where additional fair housing support needed to be established. Sub-priorities were created for each goal to ensure tangible and measurable outcomes. The overall goals identified in the report are as follows:

- Continue to expand affordable housing options in high-opportunity areas.
- Continue to support access to homeownership by providing affordable homeownership options and supporting credit counseling and homeownership education.
- Provide additional temporary and permanent shelter for homeless residents of St. Tammany Parish.
- Improve alternative transportation options for residents of St. Tammany Parish and Slidell.
- Use education to reduce NIMBYism in St. Tammany Parish and Slidell.
- Create a cadre of trained professionals in multiple organizations as fair housing referral sources.
- Continue efforts to ensure that renters and homeowners have access to healthy housing without the presence of housing quality problems.
- Improve access to before-school and after-school programs for the growing number of families with non-traditional work hours and limited flexibility.
- Communicate to Economic Development leaders the need for additional well-paying, middle-skill jobs for St. Tammany Parish and Slidell residents.
- Co-locate social services to assist low and moderate-income residents in accessing health care, education, employment, and other essential services.
- Review land use regulations for opportunities to encourage affordable housing development.

- Continue efforts to lessen and prevent environmental issues that disproportionately affect low-income and minority residents of St. Tammany Parish and Slidell.

III. Community Participation Process

- 1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.**

In the fall of 2017, St. Tammany Parish Government's Department of Health and Human Services (DHHS) in partnership with the City of Slidell conducted a comprehensive community engagement process in support of completion of the joint Assessment of Fair Housing (AFH). Engagement methods included two public meetings, three focus groups, numerous individual key stakeholder meetings, and a survey that generated 272 responses. DHHS and the City of Slidell engaged social service providers, housing developers, transportation officials and neighborhood activists on challenges and opportunities for expanding access to opportunities in St. Tammany parish and the City of Slidell.

On October 10, 2017, DHHS conducted three focus groups in fulfillment of the community engagement component of the Parish's and City of Slidell's joint AFH. The focus groups centered on three topics of relevance to the AFH: Education and Employment, Real Estate and Housing Development; and Transportation and Access for Persons with Disabilities.

On October 12, 2017, a public meeting was held at the Rosenwald Gym in the West 30's neighborhood of the City of Covington. This meeting was held in conjunction with the West 30s Task Force, which regularly holds community meetings dedicated to topics including fair housing, job and education access and quality of life issues. 28 people attended this meeting. A similar meeting was held in Slidell on October 19, 2017, where six people attended. At both meetings, DHHS and Slidell staff and their consultant presented an overview of the project, responded to attendee questions and engaged participants in a variety of interactive exercises aimed at collecting perspectives on housing challenges and priorities. Color, quarter-page advertisements ran in two local newspapers - the Times-Picayune and the New Orleans Advocate - during the week prior to the meetings. Funding for these advertisements was provided by the National Fair Housing Action Center. The meetings were also advertised through the Parish's social media accounts and listservs.

Staff also attended two public tabling events - the Northlake Health Fair in Mandeville on October 26th, and the Northshore Fall Fest Job Fair in Mandeville on November 9th.

DHHS created a freestanding website, www.StTammanyAFH.com, to provide general information about the AFH process, advertise the above engagement events, and provide a link to online English and Spanish versions of the AFH survey. Print copies of the survey in English and Spanish were provided to nonprofit partner agencies to distribute to clients.

2. Provide a list of organizations consulted during the community participation process.

- City councils and executives
 - St. Tammany Parish Department of Health and Human Services
 - St. Tammany Parish Government Department of Planning & Development
 - St. Tammany Parish Government Department of Inspections & Enforcement
 - Slidell Department of Planning and Zoning (Tara Ingram-Hunter)
 - St. Tammany Parish Government Department of Grants
 - City of Slidell Councilman, District E (Sam Caruso)
 - City of Slidell Chief Administrative Officer (Tim Mathison)
 - St. Tammany Parish Community Action Agency

- Housing and Homeless Alliance and partner organizations
 - East St. Tammany Habitat for Humanity
 - West St. Tammany Habitat for Humanity
 - STP Veterans and Military Affairs Advisory Council
 - National Alliance on Mental Illness
 - Good Samaritans
 - Northlake Homeless Coalition
 - Choices
 - Church of the King
 - Volunteers of America, Greater New Orleans (VOAGNO) soon to be VOA of Southeast Louisiana
 - Covington Housing Authority
 - Northshore Housing Initiative (NHI)
 - Council On Aging St. Tammany (COAST)
 - Catholic Charities Archdiocese of New Orleans (CCANO)
 - Northlake Behavioral Health
 - St. Joe Estates
 - Family Promise
 - Louisiana WellAhead
 - Commission on Families
 - Louisiana Healthy Communities Coalition
 - United Way of Southeast Louisiana
 - ViaLink 211

- Community Organizations from Stakeholder Meeting
 - East St. Tammany Habitat for Humanity
 - Christopher Homes
 - St. Tammany Parish Community Action Agency
 - Northshore Disaster Recovery Epworth Project

- Community Christian Concern (CCC)
- New Day Homeowner Services
- Mt. Olive Church
- Helping Hands Ministry
- START Corporation
- Boys and Girls Club
- St. Joe Estates

3. Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?

To evaluate the success with which outreach activities elicited broad participation, participants at all public events were encouraged to take the AFH survey, which included questions on demographics. These revealed the following:

- 38% of the 253 survey respondents who answered said they were nonwhite, compared to 19% of the parish's total population. 16% were black, 6% were two or more races, and 3.6% were Hispanic.
- Only six of the 259 survey respondents who answered said English was not their first language. No one completed a Spanish survey.
- 12.3% of the 253 survey respondents who answered said they had been diagnosed with a disability or impairment.
- The respondents skewed toward high levels of educational attainment. 58.1% reported having a bachelor's degree or higher.
- Income skewed high as well. 30.8% of respondents reported household income higher than \$100,000, while 33.6% reported below \$50,000.
- 61% of respondents said they had children in their household.

The survey developed for the AFH was available online in English and Spanish through SurveyMonkey. A printed copy in English and Spanish was also available at all public meetings, tabling events and stakeholder meetings. The printed survey was sent electronically to those who attended public and stakeholder meetings and attendees were encouraged to be distribute the survey widely. A link to the survey was present on all flyers, advertising, and websites affiliated with the AFH. A freestanding website was created to display upcoming events, the survey, resources, and contact information. The St. Tammany Parish government advertised the survey and public meetings on their Facebook page and parish website. In addition, an advertisement was created for the St. Tammany Advocate (parish newspaper) that highlighted upcoming public meetings and the survey. Alex Miller and Matt Rufo of Asakura Robinson were interviewed about the AFH, survey and affiliated public meetings on the St. Tammany Public Access television program, "In the Loop" hosted by Department of Health and Human Services Director Allyson Villars. In future outreach, greater efforts should be made to those who lack English proficiency, particularly in the Latino community. This

could be done through churches or other community based organizations catering to the small, but growing, Latino community.

There was a broad range of participation at the following events organized for the St. Tammany Parish and City of Slidell Assessment of Fair Housing: Stakeholder Meetings, Public Meetings, Focus Groups, Job Fair Tabling, and Health Fair Tabling. The St. Tammany Stakeholder Meeting, which was organized to coincide with the monthly meeting of the parish's Housing and Homeless Alliance, and the Slidell Stakeholder Meeting elicited a broad range of participation including public officials, private-sector developers, and non-profits providing social services, disability services, affordable housing development, transportation services, and workforce development services. The St. Tammany Public meeting in the West 30's neighborhood in the City of Covington was open to residents throughout the parish; the meeting was well attended with 28 attendees; 24 surveys were collected. The Slidell Public Meeting had low participation compared to other public meetings affiliated with the AFH. There were 6 individuals in attendance and 4 surveys were collected. Tara Hunter with the City of Slidell said public attendance is often low at meetings held in the Council Chambers. The Northlake Behavioral Health System Health Fair elicited a broad range of participants with over 80 attendees and 37 surveys were collected. The Northshore Fall Fest Job Fair was well attended with over 150 attendees and 13 surveys were collected. The focus groups organized for the Assessment included meetings focused on Transportation and Individuals with Disabilities; Housing and Real Estate; and Education and Workforce Development.

The AFH experience suggests that future public meetings should be organized in connection with existing group meetings. If there are not existing meetings to co-organize with, alternative locations should be considered that have foot traffic to generate interest.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

The following comments and themes were obtained throughout the community participation process. This summary does not limit or edit comments or views provided by public and stakeholders. There were no comments or views that were not accepted. *All comments below are included as Attachment [redacted] in submission to HUD.*

Summary of comment themes throughout engagement:

- **Housing costs are high:** Affordable housing is difficult to find. Few multifamily housing options are available. The Covington Housing Authority hasn't issued new housing choice vouchers since 2005. Strict lending standards and poor credit also make it harder for renters to get into homeownership.
- **It is difficult for the private sector to develop new, affordable and mixed-income housing stock:** High land costs, development moratoriums, lack of land zoned for multifamily, minimum lot size requirements, lack of sewer- and water-served lots, and wetlands each make housing development expensive and difficult. Low incidence of poverty makes it difficult for developer to access LIHTC funds.

- **Few transportation alternatives are available to carless households:** The demand-response transit system is very limited, as the Parish does not have a dedicated source of revenue to match federal transit funds. Many roads do not have sidewalks. This makes it essential to own a car to have access to job and education opportunities.
- **Lack of middle-skill jobs in Parish limit income potential:** Many households cannot find affordable housing because they are extremely-to-very-low-income. Many jobs in the Parish are low-wage, and commuting outside the Parish is sometimes necessary to find well-paying jobs. Workers and students are not always prepared for higher wage jobs.
- **Rapid growth is constraining infrastructure and resources:** The Parish continues to grow rapidly as the quality school system draws families.
- **Neighborhood opposition and public perception of affordable housing:** Public perception of affordable housing and transit thwarts new housing construction—such as through moratoriums.

Public Meetings

Slidell Public Meeting Comments (October 19, 2017):

Presentation feedback and discussion:

Response to “what is unfair housing”

- Discrimination based on gender, handicap, children, race
- Pricing
- Lack of access to school, health care
- Conditions of housing: mold, leaking roof
 - o City of Slidell has dealt with a number of examples in the past five years
 - Trailer near Mount Baptist church. Landlord wouldn't fix the steps, there were boards to get into the house. The City had to intervene to get help for the tenant.
 - Tenant thought they heard dripping in the house, had damaged roof and water coming in through the attic down the wall. A sewer pipe burst resulting in mold inside. The City was able to intervene and help deal with the landlord
- Reasons people don't complain: paying lower rate for rent and don't want to get priced out

Post-Presentation discussion:

- Businesses having trouble finding service-sector employees because of the cost of housing.
 - In Slidell: Felipe's, Five Guys and Cheddar's had to delay opening because of difficulty recruiting employees
- Housing units
 - Canterbury: 72 units / 1bedroom \$585 (<http://slidell-apartments.com/>)
 - Greenbrier: 60 units (<http://www.thegreenbrierestates.com/>)
 - Summerfield: (<http://www.lifeatsummerfield.com/>)
 - Camellia Gardens:
 - Villa Du Lac: only 3 units left // 400 1 bedroom, 600 2 bedroom
- Assisted living

- Adult-daycare: has a Nurse Aid (CNA) but doesn't have an as needed nurse (PRN)
- Has issues with finding certified employees
- Pearl River has a new assisted living facility
- Transportation
 - Transportation is part of the problem:
 - Transitional housing: lack of transportation is a challenge for their residents
 - Why are there no buses looping around city?
 - City of Slidell: corridors are state highways: DOT doesn't want to put in sidewalk
 - Need a corridor plan: with each corridor, DOT will approve sidewalks
 - Slidell has a new bike plan under development

St. Tammany Parish Public Meeting Comments (October 12, 2017):

Presentation feedback and discussion:

- Presenter: Has anyone experienced an unfair housing situation?
 - Commenter 1: I talked to the bank to try and get a loan. My low credit score was a barrier and, there was a lot of red tape. Didn't know how to manage all the paperwork.
- Presenter: Has anyone experienced a realtor saying you don't want to live in this neighborhood for some reason?
 - Commenter 2: I have a large family, 8 children. Landlords sometimes don't want to rent to larger families.

Post-Presentation discussion:

- Commenter 1: What does Covington Housing Authority do? Do they get money from HUD?
 - Presenter: We're in contract with the Parish, so I'm not an official representative and I can't speak for CHA. But, the Housing Authority is a separate entity, to work in Covington, and they do receive federal dollars.
- Commenter 1: The Covington Housing Authority, the vouchers application hasn't been open since 2005. They don't have vouchers. I've tried Tangipahoa, Covington, other places. I've been looking forever. All my family lives here. I'm 30 years old and I have a job.
- Commenter 2: What's definition of affordable?
 - Presenter: HUD measures it by 30% of the household income. Housing Authority is separate entity. Unfortunately, I can't speak on their behalf, but they are managed by separate individuals.
- Commenter 3: Aren't housing authority of Covington and Slidell the same?
 - Presenter: They are each regulated by same federal policies, but they are separate entities.
- Commenter 4: When you talk about renting in a community, what would be unfair of the price range of rent in this community? Sometimes for a 1BR they are paying over \$500, which is not fair. How do people set their prices for rental housing?
 - Presenter: A privately owned property can set their price to whatever they want. But what is unfair is if you see an advertisement, and you call and landlord schedules a time to view the property, say you're African American or Hispanic or any other race.

And the landlord says the rent is \$700. And you keep looking and say no because you can't afford that. Then say, the next day, someone else calls and is of a different race, and the landlord schedules a time to view the place. And the landlord says the rent is \$500. So that's unfair if a landlord is telling different prices to different people because of their race.

- Commenter 5: There appears to be a demand for affordable housing in this community, but they can't afford that. It's not only West 30's, but also young professionals who want to live and work here. How do we contact the Housing Board?
 - Annie: I have the contact info. But if there's a 4 to 5 year wait in housing stock for vouchers, that needs to be in your assessment.
 - Annie: You have to raise your hand -
 - If you think there is fair and affordable housing in STP, please raise your hand for that. Or if you think there's not, raise your hand.
 - Do you believe there is enough, - no one raises hand
 - If you believe there's not enough - everyone raises one or both hands.
 - Please pick up a survey and fill it out. Let our government know that we don't believe there's enough fair and affordable housing in St. Tammany.
- Commenter 6: Are you familiar with Civic Source? Are these being misused? When Civic Source comes in and auctions off that property, it creates a barrier to make that affordable. It hasn't been around for too long, so when it pops up, and a property doesn't have a for sale sign on it, you don't know about it.
 - Annie: Let me try to clarify. I think what you're trying to say is Civic Source comes in and obtains properties before anyone knows that it's for sale.
 - Presenter: A company that auctions off properties that have been neglected. If they aren't doing that properly, we can look at advocates to investigate that. There should be a clear process of notification to the owner and time for them to respond and make the payments.
 - Annie: That's not the issue. The issue is why can't he as an interested community member purchase that home for a fair price?
- Commenter 7: One issue, it's a case by case situation. But from my understanding whoever wins the auction takes on the responsibility of the taxes and debt of the property.
 - Presenter: Sometimes yes. And it seems like the issue is houses and properties are being sold in a different channel than other houses.
- Commenter 8: There's an app you can get on your phone, realtor.com, that gives you information. A lot of properties don't have for sale signs up anymore. A lot of it is online.
 - Annie: Are you aware that you can get a grant from St. Tammany Parish Government if you are a renter and you want to fix up your house?
 - Allyson: The person who runs/owns the property is the person who the government deals with. If that individual is low and moderate income, then they can qualify. That usually is not the case.
 - Annie: Does anyone here believe that there should be grant money for renters

to fix up their homes when their landlord is not keeping it up even if landlord is not low or moderate income. Most attendees raise their hands.

- Commenter 9: I own my home and didn't know about the grants.
 - Allyson: If you are low or moderate income and you own the land upon which the home is on, then yes you may qualify for the grant.
 - Many talking back and forth:
 - Do you have specific numbers of the West 30s?
 - 340 homes, 50% average rents about \$600.
 - I'm from the food bank, and for anyone to come in their income has to be below \$367.
 - Annie: So are you saying that \$600 is not affordable?
- Commenter 10: Absolutely not. Even the numbers in the presentation, shows we're way behind that the national average. There is no affordable housing in STP.
- Commenter 11: So this is where the misconception comes in with affordable housing
 - Housing prices and rent prices are set by median area income. In STP there's a huge gap in the income. Very high income and very low income. IRS gives you average of all area. So there's housing that says it's affordable at the median. I don't know how that gap can be made smaller.
- Commenter 12: Low Moderate income is a HUD designation. To be LMI you're at 80% or less of the AMI for your area. So for STP I think AMI is about 67k. So to qualify for benefits, you need to make below that. So that's not setting rents. That's setting boundaries on who qualifies for subsidies and assistance.
- Commenter 13: People are looking for rents they can afford.
- Commenter 14 (directed at subsidized apartment rep): Has anyone come in with a voucher to you?
 - Yes. Veterans. CHA does handle vouchers program.

Comment Cards: At each public meeting and tabling event associated with the AFH comment cards were provided for individuals to provide anonymous comments on their experiences with housing in St. Tammany and Slidell.

Comment Cards Slidell Public Meeting:

- "Elderly Housing for Baby Boomers"
- "Generational housing is common, look at succession access for deed and titles to be passed down, need financial assistance and legal assistance"
- "Access to after care and after school activities for kids: think about fixing up neighborhood parks if kids do have to go home alone"
- "Think about expanding boys and girls club, right now a lot of kids come from outside of the community to attend boys and girls club"

Comment Cards St. Tammany (West 30's) Public Meeting:

- “Any children (young professionals) have difficulty finding affordable housing within the neighborhoods of downtown Covington. In the West 30's there are many substandard homes and the title issues make it difficult to purchase property or for the city to take action.”
- “There are lots of businesses that help improve housing like, Charter”
- “Government workers don't make enough money to afford living in the parish, how can we expect anyone one else to afford living here...”

Comment Cards Northlake Behavioral Health Fair Tabling:

- “Everything is so expensive, I pay 1,300 for a 3 bedroom, after Katrina everything went up”
- “I wish the rent could go down, since Katrina the rent hasn't gone down...a single parent I know looking to rent in the house next to me told me she couldn't afford to live there, in Baton Rouge this would be \$800/900 but here it is \$1,200/1,300 for a two bedroom”
- “Everything is too high especially gas and utilities in Abita Springs they distribute gas and tack on extra money, it is my highest bill”

Comment Cards Northshore Fall Fest Job Fair:

- SSI \$846 a month, can't find housing that will work with that check
- I take my section 8 voucher to a building (apt to rent) one week and they tell me to come back later, then I come back and the rent has been raised up....
- I got my apartment on a handshake, when I got divorced my landlord lowered my rent because I didn't have a job...But if I had to look for housing alone now, I wouldn't be able to afford a nice apartment
- I work 3 jobs but still can't afford rent and have to live with my grandmother
- I was discriminated against and denied quality house do to the color of my skin

Public Comments on Draft AFH

A draft AFH was published for public comment in December 2017. St. Tammany Parish hosted a public hearing December 14 to present the draft plan and collect feedback. Additional feedback was submitted through email. Comments and responses are included below:

Public Meeting: December 14, 2017, 5:00pm-6:30pm

St. Tammany Parish Council Chambers, Building A, Koop Drive, Mandeville

- Slidell had two Superfund sites that have not been completely been remediated, owned by the federal and state governments: Heritage Park site is partially remediated. Old Southern Shipyard is a 52-acre site. They did an engineering cap on the green space with tester wells. It was supposed to be turned over to the city at 20 years but because it's still active Feds and state cannot turn it over. These should be noted in the environmental hazards section. Sean Fitzgerald working on hazardous areas. Looking at housing and public health issues.

- **Response:** Added statement to Section V.G.4.1.e – Access to Environmentally Healthy Neighborhoods: “Two previous Superfund National Priorities List sites are located in Slidell: the Southern Shipbuilding site and the Bayou Bonfouca site. According to the U.S. Environmental Protection Agency, the Southern Shipbuilding site is a 56-acre former barge cleaning, building, docking and repair facility that contaminated soils, sediments and sludges until it ceased operation in 1993. EPA cleaned the site and removed it from the NPL in 1998, but remains under federal control. It is surrounded by low-density residential neighborhoods and undeveloped land, approximately 1 mile to the west of the city center. A creosote plan operated at the 54-acre Bayou Bonfouca site located immediately west of the city center until 1972 and contaminated soil, sediment and groundwater. EPA cleaned the site in 1997, though groundwater treatment is ongoing. The State operates and maintains access to the site, which today is Heritage Park.”
- Use term “middle-skill” jobs, rather than “moderate-wage” jobs
 - **Response:** Replaced language in Section III.4
- Many homeowners are in generational housing and are very low-income, and struggle to show clear succession and title
 - **Response:** No change – this is documented in Slidell Public Meeting comments.
- The Parish lacks the resources to fund enforcement of a would-be building code – it has laid off 20% of its employees due to failed tax renewals. If Jail and Justice Center millage fails again in March, Parish budget will be taken from public health
 - **Response:** Amended Section VI.2 – Goal: Continue efforts to ensure that renters and homeowners have access to healthy housing without the presence of housing quality problems: “Adopt a Property Maintenance Code for St. Tammany Parish and allocate operating funds to conduct inspections of rental properties at tenants’ request in the next 10 years, given current resource constraints that reduce the ability to add new inspectors.”
- Many adults need help installing ramps and grab bars. The homebuilding industry is so lucrative here that it is hard to attract affordable repairmen to do home repair programs.
 - **Response:** Added to Section V.D.4.b: “Many adult residents require assistance with retrofitting homes for accessibility, such as installing access ramps and grab bars. However, it is difficult to find affordable home repair services, due to the lucrative homebuilding industry in the parish.”
- In Slidell, we don’t mandate grab bars. I have several apartment complexes coming in to Slidell. We can see if they will start encouraging those ADA units in the early development meetings. New development – the Springs. Anytime anyone comes to build in Slidell we make them go through a development meeting.
 - **Response:** No change.
- What percent of zoned land in the Parish permits multifamily development?
 - **Response:** No change. The upcoming Community Needs Assessment will address this.
- There is a three-year backlog of homeowners requests for support for septic maintenance in the parish

- **Response:** Added statement to Section V.B.iii.1.e.iii: “There is currently a three-year backlog of homeowner requests for this support.”
- Southeast Louisiana Legal Services provides support to renters in substandard housing or who have disputes with landlords
 - **Response:** Section VI.2 – Goal: Create a cadre of trained professionals in multiple organizations as fair housing referral sources: Amended Measure of Achievement (Parish): “Present information to call receivers in STPG offices to refer anyone perceiving discrimination in housing be referred to the Greater NO Fair Housing Action Center, SE LA Legal Service and Consumer Affairs Division of the LA Attorney General’s Office”
 - Section VI.2 – Goal: Continue efforts to ensure that renters and homeowners have access to healthy housing without the presence of housing quality problems.: Amended Strategy: “Because St. Tammany Parish currently lacks a Property Maintenance Code, ensure that calls from renters about housing quality problems are referred to the Attorney General’s Consumer Protection division and / or the Greater New Orleans Fair Housing Action Center, SE LA Legal Services.”
- State Department of Environmental Quality requires all subdivisions of 15 lots or larger to have centralized sewers. Subdivisions lacking centralized sewers include Slidell Manor, Alton and Ben Thomas
 - **Response:** Added statement to Section V.B.iii.1.e.iii: “The State Department of Environmental Quality only requires subdivisions with 15 lots or more to build centralized sewers. Subdivisions lacking centralized sewers include Slidell Manor, Alton and Ben Thomas.”
- Add CRA investment to Financial Services. Slidell used to have a very good relationship with Whitney on down payment assistance for homebuying.
 - **Response:** Added statement to Section VI, p. 61 under “Access to Financial Services” contributing factor: “Stakeholders did note that there are opportunities to promote additional Community Revitalization Act (CRA) investments from banks to encourage homebuying for LMI residents.”
- The GNO Fair Housing Action Center is willing to conduct testing of housing discrimination
 - **Response:** No change – Goals and Priorities section (VI) already names organization as a partner.
- What is the income threshold for ALICE (Asset Limited, Income Constrained, Employed) households?
 - **Response:** No change. Will require additional research that may occur during Community Needs Assessment.
- In first goal: Call out permanent affordable housing using the CLT model
 - **Response:** Commenter (Maxwell Ciardullo) later sent email clarification asking to add this to Goal 2, Strategy 1. Response to this clarification is discussed later in this document.
- Rural grants are threatened – what is threshold for eligibility?
 - **Response:** No change. Will require additional research that may occur during Community Needs Assessment.

- Change “pre-school and after-school programs” to “before- and after-care”
 - **Response:** Amended Section VI.2. – Goal: Improve access to before- and after-school care programs for the growing number of families with non-traditional work hours and limited flexibility.
- Want to think about helping people purchase cars too. It’s a non-profit sponsored by Toyota. Mary Burnett is my contact.
 - **Response:** No change.
- Been volunteering 8 years at St. Tammany Parish hospital as a wheelchair pusher. There’s several who have a taxi come pick them up and social worker has arranged for a voucher to get them home. 2 Mondays ago we had our first Uber vehicle come in. There may be some issue with oxygen tanks on public conveyances.
 - **Response:** No change – Section VI.2 – Goal: Improve alternative transportation options for residents of St. Tammany Parish and Slidell already identifies alternative transportation services as a strategy.
- GNOFHAC is happy to be a resource for trainings to educate parish residents about NIMBYism.
 - **Response:** Added “Partner with GNOFHAC to...” two strategies under “Use education to reduce NIMBYISM in St. Tammany Parish and Slidell” goal in Section VI.2.
- Public transportation is right up there. If you can’t get to your appointments, you can’t get to a job to earn money, you can’t get to a school to get further education... A lot of people drive people to the VA hospital in New Orleans because the bus goes from Hammond and does not stop in Covington/Mandeville.
 - **Response:** No change – Section VI.2 – Goal: Improve alternative transportation options for residents of St. Tammany Parish and Slidell already recommends public transit improvement strategies.

Comments Submitted via Email

- Virginia Williams (Submitted December 21)
 - Page 62: Use the power of your ability to invest in infrastructure to leverage affordable housing investments by developers.
 - **Response:** No change. Goal already includes strategy “Develop an incentive program that provides infrastructure funding for development in return for a required percentage of affordable housing development.”
 - Page 64: In my past work in economic development, I found business owners, especially food service and hotels, who were willing to provide transportation for employees. Costs are substantially reduced when several of them invest in vans or small buses to pickup and drop-off employees. They can, also, contract with an existing business to provide the service. Fixed-routes are usually very expensive to operate and schedules undependable.
 - **Response:** No change. Goal already includes strategy “Publicize Green Ride service, employer-provided transportation options, and other alternative transportation services.”

- Page 65: Very effective ride-share and van pooling programs have been developed through other Regional Planning Commissions. I would encourage you to review CommuteSmart program in Birmingham as a model.
 - **Response:** No change.
- Maxwell Ciardullo, Greater New Orleans Fair Housing Action Center (Submitted December 28th)
 - Demographic Summary (pg. 17): While the AFH requires these questions be answered with 2010 Decennial Census data, it's also worth supplementing with more recent 2015 American Community Survey 1 year estimates. Especially given how quickly the Parish is growing, this more up-to-date data may be useful. As an example, 2015 data shows the Parish is now 21.3% non-white, not 18.6%, as noted by 2010 Census data.
 - **Response:** Added two statements:
 - “By 2016, this figure reached 21%, according to American Community Survey 1-year estimates.” referring to the nonwhite population.
 - “... and 5.5% in 2016” referring to Hispanic residents.
 - General Issues, i.1.b (pg. 18): Detailed data on block groups that are highly segregated is incredibly useful for planning and implementing many of the goals listed in the draft AFH. However, this data might be most useful to Parish and City officials in a map that shades block groups based on the three groupings presented here.
 - **Response:** No change. Maps will be included in the Community Needs Assessment.
 - General Issues, 2. (pg. 20): In addition to the evidence provided here for racial discrimination, GNOFHAC also recently conducted ten paired fair housing tests in Slidell—with one white and one African American tester—posing as prospective tenants and inquiring about apartment availability. Testers were matched to ensure that they had similar incomes, career paths, family types, and rental histories. The primary difference between the two testers was race. In four out of ten tests, we noted discriminatory treatment of the African American tester.
 - **Response:** Added statement to section V.G.2.a Segregation/Integration in Slidell: “The Greater New Orleans Fair Housing Action Center recently conducted ten paired fair housing tests in Slidell—with one white and one African American tester—posing as prospective tenants and inquiring about apartment availability. Testers were matched to ensure that they had similar incomes, career paths, family types, and rental histories. The primary difference between the two testers was race. In four out of ten tests, we noted discriminatory treatment of the African American tester.”
 - Fair Housing Enforcement, Outreach Capacity, and Resources Analysis, 2. (pg. 42): Though not a part of the Louisiana Equal Housing Opportunity Act, the state did pass housing protections for victims of domestic violence in 2015. The Louisiana Violence Against Women Act (LaVAWA) provides four key protections:

- Anyone in need of emergency assistance can contact the police without penalty.
 - Victims of domestic violence can no longer be evicted because of the violence of an abuser.
 - Victims can no longer be denied housing solely on the basis of past abuse.
 - Victims can now terminate a lease early and move when necessary to ensure their safety.
 - **Response:** Added this text to Section V.E.2.
- Goal 1, Strategy 2: Incentivizing affordable units in multi-family developments: Incentivizing developments that provide a percentage of affordable units is an excellent goal. Given New Orleans experience with this, we strongly recommend amending the zoning language to create a consistent, predictable standard for developers (see New Orleans CZO). Language should specify:
 - The percentage of units required to be held affordable to receive the incentives
 - The AMI income limits for the units required to be held affordable
 - The minimum period of affordability for the newly constructed affordable units (we recommend 50 years to "in perpetuity")
 - The distribution of affordable units throughout the development, to prevent concentration of units
 - The design standards of the affordable units. New Orleans requires units to be comparable in infrastructure, construction quality, size, and exterior design to market-rate units, but allows different interior finishes and features.
 - The timing of construction of the affordable units compared to the market rate units.
 - That all entrances/exits and amenities in the building must be available equally to occupants of the affordable and market rate units.

In addition to offering expedited permitting, the Parish and City should consider also offering reduced parking requirements and density or height bonuses.

 - **Response:** Added “reduced parking requirements and density or height bonuses” to expedited permitting strategy.
- Goal 1, Strategy 5: Increase availability of LIHTC funds in Parish: The LIHTC program is the single largest source of new construction for affordable housing in the State of Louisiana. The Louisiana Housing Corporation (LHC) is therefore the largest provider of affordable housing in the state. However, an analysis of recently awarded LIHTC projects demonstrates that the majority were in high poverty and racially concentrated census tracts of urban areas. Not only does this run counter to the State of Louisiana’s federal civil rights obligations, it also impedes a family’s ability to access good jobs, good schools, and all the other benefits of social mobility that living in a high opportunity neighborhood can provide. Therefore, we would recommend that instead of advocating for the use of ALICE or reduced/free lunch households as a qualifier in the QAP, the Parish and City join GNOFHAC in advocating for the QAP to include points for demonstrated collaboration with or proximity to drivers of

- Goal 5, Strategy 3: Create landlord list to educate about rental quality. This is an excellent goal, but given the resources required to complete it, it might make more sense for the Parish to consider a rental registry requiring landlords to register their property.
 - **Response:** No change.
- Goal 5, Strategy 4: Expand fair housing outreach with public officials. The LHC may not be the best-equipped agency to perform fair housing trainings with local officials. GNOFHAC is willing and able to specifically educate local officials about fair housing concerns related to NIMBYism, development moratoriums, and downzoning efforts.
 - **Response:** Added “Partner with GNOFHAC” to strategy.
- Goal 6, Strategy 1: Increase fair housing testing: GNOFHAC will gladly partner on investigating housing discrimination in the parish and city through testing efforts.
 - **Response:** No change.
- Goal 7, Strategy 1: Renter housing quality referrals: Calls about substandard housing should be referred to Southeast Louisiana Legal Services. GNOFHAC will continue to receive any referrals related to housing discrimination.
 - **Response:** Added “SE LA Legal Services” to list of referral targets in strategy.
- Goal 7, Strategy 2: Adopt property maintenance code: Within the property maintenance code, the Parish should include the strictest possible anti-retaliation provisions that do not conflict with state law. Without anti-retaliation provisions, a complaint-based code enforcement system can set renters up for eviction or other retaliation when they file a complaint, given the weak renter protections in state law. GNOFHAC is prepared to advise on these provisions.
 - **Response:** Added “with strict anti-retaliation provisions” to strategy to adopt a property maintenance code.
- Goal 10, Strategy 3: Establish affordable housing near NTCC: This is a laudable goal, however, it's worth considering whether building affordable housing near NTCC may actually isolate its residents. Besides the College, there are few other amenities in the area and nearby Lacombe is already an area with a higher concentration of non-white residents than the Parish as a whole.
 - **Response:** Added “access to public assets and job opportunities” as potential criteria for decision-making, and made NTCC a possible example location along with areas walkable to central Slidell and central Covington.
- Goal 11, Strategy 1: Discourage development moratoriums: This may be the most important strategy in the plan and GNOFHAC is fully committed to assisting with the education of local officials about fair housing concerns related to NIMBYism, development moratoriums, and downzoning efforts.
 - **Response:** No change.

IV. Assessment of Past Goals, Actions and Strategies

Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents.

- a. Discuss what progress has been made toward the achievement of fair housing goals.**

Fair Housing Goals: St. Tammany Parish

The Parish's 2009 *Analysis of Impediments to Fair Housing* (AI) identified three primary impediments to fair housing in St. Tammany Parish: 1) Limited choice in affordable housing due to unit availability; 2) NIMBYism; and 3) Lack of public information regarding fair housing and housing assistance.

To expand choices in affordable housing units, the Parish committed to:

- Work with local nonprofit organizations in an effort to increase the number of available affordable housing units in the area
- Fund requests from nonprofit organizations to provide “homeownership classes and related activities,”
- Work with public service agencies working to “provide homeowners and general housing assistance to low- to moderate-income citizens.”
- Promote the development of affordable housing through either renovation or demolition and reconstruction through partnerships with nonprofit agencies.
- Promote specialized financing options for affordable housing through the St. Tammany Parish Finance Authority and similar agencies
- Coordinate with the Louisiana Land Trust for the disposition or redevelopment of properties that have been acquired through the Road Home Program
- Targeted marketing and the distribution of available housing information to citizens and members of the public and private sector
- Construction and repair of affordable housing units by the Parish, private developers and non-profit organizations

To reduce NIMBYism, the Parish planned to:

- Deploy an affordable housing public awareness campaign
- Display informational affordable housing materials at public locations around the Parish

To address the lack of public information regarding fair housing and housing assistance, the Parish planned to

- Make fair housing brochures available to all those who receive assistance from the Parish and for distribution in public locations around the Parish
- Place a link to HUD's fair housing website on the Parish's and Community Action Agency's web site

- Mail the fair housing brochure with a letter from the Office of Social Services to the local homebuilders association, local board of realtors, and local banking board, and those who currently receive any public assistance from the Parish
- Place links on the Parish website to housing assistance organizations and programs
- Add brief descriptions of the assistance programs to the web site
- Execute a fair housing informational campaign throughout the area
- Utilize Community Development Block Grant (CDBG) funds to improve existing low- to moderate-income and minority areas
- Distribute information about organizations that provide down payment assistance to those in need so that they are able to find housing in the neighborhood of their choosing

Progress in Achieving Goals: St. Tammany Parish

Since the 2009 St. Tammany Parish *Analysis of Impediments*, the Parish has made progress in the three core areas identified including expanding choices in affordable housing units, reducing NIMBYism, and addressing the lack of public information regarding fair housing and housing assistance. Actions undertaken include:

- **Funding homeowner rehabilitation assistance for low-income homeowners**, particularly those with aging septic systems who were facing environmental fines; Continuing to administer a home rehabilitation program; Applying to Federal Home Loan Bank of Dallas for Special Needs Assistance Program (SNAP) money and rehabbed four additional homes; Working with Louisiana Housing Corporation (LHC) to bring hurricane assistance dollars to rehab four homes that have qualified; Participating on West 30's task force and supporting a developer to purchase blighted properties and renovate them into high quality properties for low- to moderate-income residents.
- **Funding homelessness prevention programs**; The St. Tammany Parish Community Action Agency runs an Emergency Solutions Grant, Supportive Housing Program, and Community Services Block Grant (CSBG) for housing assistance. In addition, the Parish runs a Housing and Homeless Assistance Program (HAPP); DHHS recruits nonprofits to set up tables and talk to residents about housing, homeownership, employment, training, education, and funding sources at community meetings; The Parish provided over \$800,000 to fund the first land trust in the area – the Northshore Housing Initiative - and partners with them to encourage realtors, developers, and other agencies to help get residents into homes.
- **Offering the Low income Home Energy Assistance Program (LIHEAP)**, which helps low-income households pay utility bills.
- **Funding housing counseling programs** to assist low-to-moderate income households in achieving homeownership; the parish funded the startup of both Habitat West's and New Day's housing and homeownership programs
- Placing links on the **Parish website** to housing assistance organizations and programs
- Providing **public fair housing workshops**, including a recent session where St. Tammany Parish partnered on with the City of Slidell on April 28, 2017

- Procuring a consultant to develop a Parish-wide **Community Needs Assessment** that will educate the public on the benefits of diverse housing choices, including units affordable to low income households. The Community Needs Assessment is anticipated to be complete in Spring 2018.
- The Parish also participated with the federally funded National Disaster Resilience Competition program for Louisiana and worked to insure inclusion of St Tammany Parish projects.

Fair Housing Goals: City of Slidell

The City of Slidell's 2010 Analysis of Impediments to Fair Housing (AI) identified the following primary impediments to fair housing in Slidell: A need for a referral system, a lack of outreach activities, a lack of understanding of what "Fair Housing" means, a lack of financial literacy by residents that resulted in a denial of home loans or high APR, discrimination in the rental market, and issues with zoning. To ensure fair housing for all residents, the City committed to:

- Increase fair housing outreach and education throughout Slidell
- Enhance homebuyer education activities including financial literacy
- Monitor new housing construction for ADA compliance
- Enhance Fair Housing education opportunities for landlords
- Review inclusiveness of housing developments

Progress in Achieving Goals: Slidell

The 2015-2019 Slidell Consolidated Plan proposes to utilize funding to provide a suitable living environment, strengthen infrastructure, protect the environment, provide decent affordable housing, guarantee fair housing for all persons, help the homeless in a continuum of care, and generally improve targeted neighborhoods. Proposed spending of HUD CDBG entitlement funding dollars, will occur in a lower income census tract in Slidell (Census Tract 409). Goals related to fair housing that are included in the five-year plan include:

- Construction of an outdoor basketball court to provide adequate public and recreational facilities in this area
- Sidewalk improvements or construction of new sidewalks to improve residents' mobility and access to services
- Drainage improvements to mitigate flooding issues
- Fair housing awareness programs (including the workshop hosted with St. Tammany Parish in April 2017)
- Housing repair programs
- Homeless assistance

To address sidewalk conditions, the City of Slidell has been working on sidewalk improvements and its housing stock in past CDBG program years. In this program year, the City will continue improving sidewalks and drainage. City has had excellent performance with its sidewalk program as planned. The city has also proposed to provide small business opportunities through micro-enterprise and economic development.

b. Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences).

St. Tammany Parish and the City of Slidell perceive a need to better understand the overall affordable housing inventory within both jurisdictions, including the size of units, the number of units available to persons with disabilities and special needs, the income levels required, and the expiration dates of any affordability requirements. This inventory will assist both jurisdictions in setting metrics and determining how the funds being expended are meeting the need and filling gaps.

St. Tammany Parish: The Parish currently does not display the Fair Housing logo or information on the DHHS or Community Action Agency websites. This would be an easily remedied item to meet this goal from the 2009 Analysis of Impediments. In addition, stakeholders see a need for additional information availability about the quality of and need for affordable housing to lessen stereotypes and NIMBYism. No unintended consequences from previous activities have been noted or reported.

City of Slidell: In order to review the inclusiveness of housing developments and the availability of affordable housing compared to the need, the inventory suggested above would be a future step to improve Slidell's success in meeting its goals. Dating back to 1994 (when Slidell's CDBG program started) all funding has benefitted low to moderate income areas or individuals. There has been no major audit or monitoring findings, and the community has continued to spend its federal funds in appropriate ways. There has been no report of harmful unintended consequences.

c. Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals, or mitigate the problems it has experienced.

St. Tammany Parish: St. Tammany Parish can easily re-incorporate the Fair Housing logo and information about Fair Housing on the DHHS and Community Action Agency websites. It should also continue to pursue innovative financing and funding strategies to increase the inventory of new affordable housing units. An informational campaign about the need for affordable units for a healthy and strong community, and the high quality of affordable housing proposed and built in the Parish, would be a helpful step to meet this goal.

City of Slidell: Considering that the City of Slidell is the second smallest entitlement program in the State of Louisiana and its CDBG allocations is relatively small, it should continue to increase participation in regional planning and funding processes. The City of Slidell could also increase participation in statewide initiatives such as the Louisiana Fair Housing Working Group to leverage external resources and programs. The City should continue to work with housing organizations and nonprofits to improve housing access and conditions for the protected class, and can also increase communication with residents, landlords, and developers to improve understanding of fair housing laws and policies.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Current goals are wide-ranging and the Parish and City of Slidell are aware that they will take time and effort to accomplish. However, they reflect a wish to continue with the progress achieved based on past Analyses of Impediments and to move forward a list of recommendations that will ensure that housing is affordable, that discrimination is not tolerated, that all residents of St. Tammany Parish and Slidell will have access to opportunity, and that those who are in most need of housing will have their needs met.

Past programs and feedback from residents at public meetings confirm there is a need to continue improving the core fair housing issues.

V. Fair Housing Analysis

A. Demographic Summary

Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

St. Tammany Parish's total population has grown rapidly since 1990, from 119,471 to 206,672 in 2010.

Since 1990, St. Tammany Parish has been home to a smaller percentage of non-white, non-Hispanic residents than the region, though this population has increased in proportion to white, Non-Hispanic residents in both. According to Table 1, 18.6% of Parish residents are non-white (i.e. not "white, Non-Hispanic"), compared to 46.3% in the region. By 2016, this figure reached 21%, according to American Community Survey 1-year estimates. These figures have grown from 1990, when rates were 14.0% and 40.7%, respectively. Growth in the minority population has been largely driven by Hispanic residents. This group grew from 2.1% of the Parish population in 1990 to 4.6% in 2010 and 5.5% in 2016, and from 4.2% to 7.8% in the region.

The Parish's foreign-born population has more than doubled since 1990, from 1.6% to 3.6%. However, this remains well below the current regional share of 7.3%. This is also the case with limited English proficiency population, which grew from 1.2% to 1.9% in the Parish, but which is 4.4% of the region's population.

As the parish grew from 1990 to 2010, it also aged. Children declined from 30.8% in 1990 to 25.8% today, though this group remains greater than the regional share of 23.4%. Meanwhile, the share of people aged 65+ jumped from 8.6% to 12.5% - higher than the regional share of 12.2% in 2010. The total share of families with children declined from 55.7% to 45.5% in the parish, closer to today's regional share of 42.3%.

See Section G for a demographic summary of Slidell.

B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation. (Dissimilarity Index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.)

HUD commonly uses a "dissimilarity index" to measure levels of racial/ethnic segregation in a community. According to HUD, it "represents the extent to which the distribution of any two groups

(frequently racial or ethnic groups) differs across census tracts or block-groups.”¹ With Table 3 index values consistently below 39 since 1990, St. Tammany Parish has had low segregation between non-white/white (36.5), Hispanic/white (16.6), Asian or Pacific Islander/white (34.9). Black/white populations in the parish are moderately segregated, and are increasingly segregated since 2000. Black/white has moderate segregation with a current dissimilarity trend of 51.6. However, considering that 81.4% of the population is white and only 10.6% is black, 4.6% is Hispanic and 1.3% is Asian, these dissimilarity numbers in reality could represent a higher rate of segregation.

b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

The racial/ethnic demographics of St. Tammany Parish are currently 81.4% white, Non-Hispanic, 10.6% black, Non-Hispanic, 4.6% Hispanic, 1.4% Two or More Races, Non-Hispanic, 1.3% Asian or Pacific Islander, Non-Hispanic, 0.4% Native American, Non-Hispanic, and 0.3 Other, Non-Hispanic. The jurisdiction has a mix of areas that reflect this demographic, areas that are half white and half people of color and areas that are almost completely white. Additionally, 97.8% of St. Tammany residents are U.S.-born. The top two countries of origin outside of the United States are Honduras at 0.6% and Mexico at 0.4%. Most census tracts reflect this demographic, and some census tracts are 100% U.S.-born. The English Language Proficiency of the jurisdiction is 92.2% and 1.8% categorized as having Limited English Proficiency. Of the LEP languages, Spanish is the vast majority, followed by a much smaller number speaking Chinese. Spatially, the LEP population closely follows the foreign-born population living patterns.

The block groups below demonstrate disproportionately high and low levels of segregation. According to AFFH Map 1, the following block groups reflect the racial/ethnicity demographic of St. Tammany Parish:

- 040102-2
- 041300-1
- 041300-4
- 041209-3
- 040708-2
- 041202-1
- 041101-2

According to AFFH Map 1, the following block groups are approximately 50% People of Color or higher:

- 040501-1
- 040501-2

¹ U.S. Department of Housing and Urban Development, “Affirmatively Furthering Fair Housing (AFFH) Data Documentation” September 2017. Available at: <https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0003a-September-2017.pdf>

- 040502-1
- 041102-1
- 040704-3
- 041202-2
- 040803-3
- 040803-2

According to AFFH Map 1, the following block groups are over 95% white:

- 040103-3
- 040102-1
- 040601-2
- 040102-4
- 040304-2

c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

In reference to Table 3, dissimilarity trends in jurisdiction have fluctuated since 1990. In 2010 Non-white/white, Hispanic/white, and Asian or Pacific Islander (API)/white racial groups all reported the lowest segregation in the 1990 to Current timeframe. Black/white segregation, however, has consistently increased since 2000. The Hispanic/white dissimilarity index has been the lowest in St. Tammany with a 1990 trend of 13.8, a 2000 trend of 13.7, a 2010 trend of 13.6 and a current trend of 16.6. API/white has fluctuated the most with a 1990 trend of 34.5, a 2000 trend of 28.6, a 2010 trend of 26.8, and a current trend of 34.9. The black/white index is the only racial index above “low segregation” into “moderate segregation” with the 1990 trend of 44.8. The dissimilarity trend went down with the 2000 trend of 43.4, and has risen to 45.0 in 2010 and currently is at its highest level of segregation at 51.6.

d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

Census Tract 040501 is the only census tract with majority renter occupied housing at 51.6%. The area is highly integrated with a population of approximately half white and half people of color. Overall, the Parish is majority owner-occupied housing. In 2015, the Census Tracts with the highest percent of homeowners are all over 90%: 041208 (98%), 040304 (94%), 041212 (92%). These areas tend to be more segregated than areas with lower percentages of homeownership. In 2010, the highest percent of homeowners were in the same areas as 2015. From 2010 to 2015, these three census tracts lost 390 homeowners and gained 34 renters.

e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

Affordable housing is difficult to find in St. Tammany Parish, and few multifamily housing options are available. High land costs, development moratoriums, lack of land zoned for multifamily, minimum lot size requirements, flood insurance costs higher for rental properties, NIMBYism, lack of sewer- and water-served lots each make housing development expensive and difficult. The Parish has no R/ECAPs, which makes it difficult for developers to access LIHTC funds. The households in need, however, cannot find affordable housing because they are extremely-to-very-low-income. Many jobs in the parish are low-wage, and commuting outside the parish is sometimes necessary to find well-paying jobs. Additionally, workers and students are not always prepared for higher wage jobs.

An August 21, 2016 article in *The New Orleans Advocate* illustrates the community opposition that led to a development moratorium. The Northshore Housing Initiative Community Land Trust secured a \$1 million HOME grant with the purpose of building 16 three-bedroom homes over four years. Tammany Terrace was identified as the location, and residents soon gathered 700 signatures and complaints about drainage and sewerage problems that could increase by adding 16 homes to the 35 already there. While drainage problems were presented to the Parish Council, “property values” were the only concern expressed when the Community Land Trust’s Executive Director spoke with Tammany Terrace residents. The Tammany Terrace homes would have been approximately \$170,000 each. The Parish has identified the need for more affordable housing, and specifically workforce housing, to remain competitive in economic development opportunities. Public opposition, misperception, and development moratoriums, however, continue to present a barrier to creating affordable housing. (For additional information, see http://www.theadvocate.com/new_orleans/news/communities/st_tammany/article_473f0556-664d-11e6-ba63-db6a00912c38.html.)

36% of the 41 survey respondents who self-identified as black reported experiencing housing discrimination, and 55% had difficulty finding safe, quality housing in a neighborhood they could afford. Compared to respondents who self-identified as white, 7% have experienced housing discrimination and 27% have had difficulty finding safe, quality housing in a neighborhood they could afford.

2. Additional information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics

Throughout the preparation of the AFH, comment cards were collected at every public meeting and tabling event. Residents at each public meeting and tabling event spoke of instances when they, their family member, or their client were denied housing because of their race or when they experienced undue hardship obtaining housing because of their race. Undue hardships included seeing a rental advertised, and being told it was no longer available when they called the number listed. Another resident mentioned during a public event that he had had difficulty accessing housing with his Housing Choice Voucher and that landlords would increase prices to discourage him from

renting their properties. One resident wrote on a comment card their experience with segregation noting, “I was discriminated against and denied quality house do [due] to the color of my skin.”

b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups

The Parish is working to make place-based investments such as co-location of public services and creation of a behavioral health campus that will assist protected classes in accessing these service options. However, additional opportunities for place-based investment, including enhancements of public transportation through potential fixed-route services, and investment in Complete Streets infrastructure, may provide strong benefits to protected classes and should be prioritized in segregated areas and areas with significant low-to-moderate-income (LMI) and asset-limited, income-constrained, employed (ALICE) populations.

3. Contributing factors of segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

To varying degrees, the following factors impact segregation in St. Tammany Parish:

- Property maintenance code adoption
- Wetlands, land use and zoning laws
- NIMBYism (Opposition of new development from existing residents)
- Need for public investment in specific neighborhoods including services or amenities
- Location and type of affordable housing
- Resident opposition to development based on class and race
- Insufficient knowledge about fair housing enforcement and resources

See Section G for contributing factors for City of Slidell.

ii. R/ECAPs

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

- a. None in St. Tammany Parish
- b. 43 census tracts in Orleans Parish
- c. 3 in Jefferson Parish
- d. 1 in St. John the Baptist

b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

While there are no R/ECAPs in St. Tammany Parish, the region's R/ECAPs are currently 81% U.S. born, black, non-Hispanic, and English proficient. The region is predominantly U.S. born, white, non-Hispanic, and English proficient.

c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

Since 1990, the R/ECAPs in Orleans Parish have remained largely unchanged. Some areas have shifted slightly. Most notably, Census Tract 001751, which is a large swath of New Orleans East, was a R/ECAP in 1990, 2000, and currently. In 2010, it was not a R/ECAP. In 2010, two census tracts in Jefferson Parish became R/ECAPs. Currently, three census tracts in Jefferson Parish are R/ECAPs. Additionally, St. John the Baptist Parish currently has its first R/ECAP in one census tract.

2. Additional information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

No additional information is available. There are no R/ECAPs in St. Tammany Parish or the City of Slidell.

3. Contributing factors of R/ECAPS

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

There are no R/ECAPs in St. Tammany Parish or the City of Slidell.

iii. Disparities in access to opportunity

1. Analysis

a. Education

i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

According to the Louisiana Department of Education's annual school performance ratings, St. Tammany Parish public schools are among the highest performing in the state. Of its 55 schools, 19 received an A rating, 26 received a B, and 10 received a C in 2017. None received a D or F grade.² This makes both jurisdictions superior to the region in access to quality public education. However, black, non-Hispanic residents tend to be concentrated in areas with comparatively lower-performing schools in both St. Tammany Parish and the City of Slidell.

² Source: <https://www.louisianabelieves.com/resources/library/performance-scores>

HUD's school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools.³ A higher index score on a scale of 1 to 100 indicates higher access to quality schools. By this measure, residents of St. Tammany Parish have higher access to "proficient" schools than the New Orleans-Metairie, LA Region. According to Table 12, white, Non-Hispanic (score of 79) and Asian or Pacific Islander (78) groups have the highest access to proficient schools. The black, non-Hispanic population has the lowest access to proficient schools (68).

In the region, white (66), Hispanic (60) and Native American (61) groups have the most access to proficient schools. Hispanic and Native American, Non-Hispanic groups have the lowest in both population categories.

Census tracts 407.01, 411.02, 411.01, which are located between Lacombe and Slidell, in the eastern part of the parish, have the lowest access to quality education. While these tracts are majority white, Non-Hispanic, U.S.-born, and between 40% - 60% of families have children, their share of black and Honduran residents are higher than the regional average.

ii. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

Map 7 shows a concentration of the region's lowest proficient schools west of Slidell. This area has a higher percentage (24%) of black, Non-Hispanic residents than the region's total demographic makeup. The region's black population, however, also lives in areas with more proficient schools. Areas with high proficiency levels have significant populations of families with children. Honduras-born residents constitute the highest number of non-U.S. born residents in the jurisdiction. The population is concentrated in a variety of proficiency levels.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

While St. Tammany Parish has greater access to proficient schools, there is still a disparity between white, Non-Hispanic (79.4) and black, Non-Hispanic (67.6) residents. According to the Analysis of Impediments, since 1990, St. Tammany has gained tens of thousands of new residents and low- to moderate-wage earners are largely left behind in many areas, including lowest access to the highest rated schools. A lack of public transportation creates a barrier for the residential living pattern options available to families. In the AFH online survey for St. Tammany and Slidell, over 60% of 41 black, Non-Hispanic respondents cite the cost of housing as a barrier to living in their preferred neighborhood. Over 80% cite a desire for affordable housing in more neighborhoods.

³ U.S. Department of Housing and Urban Development, "Affirmatively Furthering Fair Housing (AFFH) Data Documentation" September 2017. Available at: <https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documents-AFFHT0003a-September-2017.pdf>

b. Employment

i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

For those 25 years or above with at least a bachelor degree, the biggest disparity in labor market engagement in the St. Tammany Parish is between Asian or Pacific Islander (API), Non-Hispanic (62.0) and black, non-Hispanic (44.6) groups. In access to jobs, measured by proximity, the biggest disparity in the jurisdiction is also between API (60.53) and black (56.1) populations. The New Orleans-Metairie, LA Region has a significantly larger disparity in both labor market engagement and access to jobs. The region's greatest labor market engagement disparity is between white (58.4) and black (33) populations, and the greatest disparity in access to jobs is between Hispanic (54.7) and black (44.6) populations.

ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

Map 8 shows that the jurisdiction's highest access to jobs are located close to the urban cores and major highway intersections. St. Tammany Parish's areas of strong labor market engagement, however, are located in areas with higher percentages of white, Non-Hispanic, U.S.-born residents than the jurisdiction. Residential living patterns in the jurisdiction have a low level of proximity disparity, and a high level of labor market engagement disparity. In the region, as one travels out of the urban cores the access to employment decreases.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

While table 12 shows relatively high access to jobs, community participation and input from focus groups reports the opposite. In the AFH online survey for St. Tammany and Slidell, one of the greatest barriers to finding safe and affordable housing in a neighborhood of one's preference was a lack of access to good jobs along with lack of affordable housing and not having enough money for rent and lack of transportation. Multiple residents provided comments for the comment cards that referenced the lack of access to jobs, particularly jobs that paid enough to afford housing. One resident mentioned that they had to work 3 jobs but still could not afford rent. The St. Tammany Parish Annual Plan for 2016 also details that Parish employees participate in coalitions with organizations such as the Workforce Investment Board, among others, to gain a comprehensive understanding of unmet needs.⁴

c. Transportation

⁴ St. Tammany Parish Government Department of Health and Human Services, "2016-2017 CDBG Annual Plan" August 2016.

i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

St. Tammany Parish has much lower access to transportation related to costs and access to public transit than the region. There is, however, a relatively small disparity between groups in St.

Tammany Parish's total population. Based on HUD Table 12, access to transportation is as follows:

- Asian or Pacific Islander, Non-Hispanic (API) population has the greatest access to transportation (26.7)
- Hispanic population is second (24.1)
- White, non-Hispanic is third (22.78)
- Black, non-Hispanic is fourth (22.37)
- Native American population has the least access (21.84)

Access to Low Cost Transportation remains around the same level:

- API population has the greatest access to low cost transportation (24.6)
- Hispanic population is second (23.4)
- Black, non-Hispanic population is third (23.3)
- White, non-Hispanic population is fourth (21.8)
- Native American population has the least access (21.6)

ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

In reference to Map 11, the cost of transportation for the protected class is relatively high throughout the jurisdiction. In Map 11, the values are inverted so that the higher the index, the lower the cost of transportation. High transportation costs are likely tied to the sprawling land use patterns and the lack of a fixed route transit system in St. Tammany Parish. In contrast, the New Orleans-Metairie Region, which has two fixed route public transportation systems, the access to transportation index is in the upper 90s while in St. Tammany, the index is in the 20s.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

65.3% of 259 AFH respondents reported Access to Public Transportation in their neighborhood is "poor." only 13.1% rated it "excellent" or "good." In addition, participants of the Transportation Focus Group and public meetings reported challenges with a lack of a fixed route system. While they may benefit from the STAR Transit service, many older residents commented that the service is limited in the number of rides it can provide and the need to schedule around when rides are available.

d. Access to Low Poverty Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

St. Tammany Parish residents have lower exposure to High Poverty Neighborhoods than the New Orleans-Metairie, LA Region. The parish also experiences less disparity among protected class groups than the region. In St. Tammany Parish:

- Blacks, Non-Hispanic have the highest exposure to poverty at 46.1 (the higher the score, the less exposure to poverty in all cases)
- Native Americans, Non-Hispanic have the next highest exposure at 54.4
- Hispanics have a lower exposure at 60.9
- Whites, Non-Hispanic have a slightly lower exposure to poverty at 64.8
- Asian or Pacific Islanders, Non-Hispanic (API) have the least exposure to poverty at 68.3

The region is consistent with the jurisdiction insomuch as the black population has the highest exposure to poverty, but the remaining protected classes vary in order.

ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.

The jurisdiction has significantly lower exposure to low poverty neighborhoods than the region. The areas in St. Tammany with the highest exposure to poverty are census tracts 040501 (11), 041202 (11), 040704 (21), 040604 (25). These areas have a higher percentage of Non-white and foreign-born protected classes.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

While the number of St. Tammany Parish residents who live below the poverty level has increased, the availability of affordable housing has not. St. Tammany's Department of Health and Human Services & Community Action Agency is continually developing partnerships with local nonprofits and service providers to provide project coordination and management, community outreach, and the provision of services. Examples of projects receiving DHHS funding including Safe Haven, a behavioral health hub that has group homes for severely and persistently mentally ill residents; Cardinal Cove, which will provide shelter for our eight specialty court participants; and the Danielle Inn, a property that has been identified and rented to serve as a shelter for homeless veterans. These efforts will increase access to health care, basic needs, mental health, housing, financial, and educational services for low- to moderate-income neighborhoods. The targeted neighborhoods have the population density and housing and infrastructure needs to make them eligible for CDBG projects.

e. Access to Environmentally Healthy Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

HUD's Environmental Health Index measures a neighborhood's potential exposure to harmful toxins, using a combination of EPA estimates of air quality indicators. A high value on the 0 to 100 scale indicates less exposure to toxins harmful to human health.

According to Table 12, very few disparities exist across racial and ethnic groups in St. Tammany Parish. All groups have either a score ranging from 48 to 50. Compared to the parish, New Orleans-Metairie, LA Region has less access to environmentally healthy neighborhoods, and has greater disparities among the protected classes. Black and Hispanic populations have the lowest access at the regional level, scoring just 28.

ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

Areas in St. Tammany with the highest Environmental Health Index are in close proximity to the Lake Pontchartrain northern shore. These census tracts 412.04 (64) and 412.02 (65) have a higher percentage of Non-white, U.S.-born residents than the jurisdiction. Approximately 30-40% of families in the tracts have children. The remainder of St. Tammany mostly scores high in the Environmental Health Index. The only outliers in the jurisdiction are census tracts 403.05 (23), 404.00 (22), and 40.705 (29). Over half of families in the area have children.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

The parish's rapid growth in rural and suburban areas has been possible due to decentralized sewer practices, including thousands of individual aerated treatment units and septic tanks. The State Department of Environmental Quality only requires subdivisions with 15 lots or more to build centralized sewers. Subdivisions lacking centralized sewers include Slidell Manor, Alton and Ben Thomas. The Parish Department of Environmental Services has identified four watershed areas in STP with multiple subdivisions or areas that require sewer distribution systems inspections. The Department of Environmental services has identified over 10,000 properties to inspect by 2020 as part of its Decentralized Management Plan. Homeowners are responsible for maintaining their systems. Low- to moderate-income households are eligible to apply for assistance from the Parish to support this maintenance. There is currently a three-year backlog of homeowner requests for this support.

f. Patterns in Disparities in Access to Opportunity

i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.

Review and analysis of HUD data, survey responses, and other public input has revealed that black, non-Hispanic households have the lowest levels of access to high performing schools, employment, and low poverty neighborhoods in the region and St. Tammany Parish. However, black households' access to these opportunities is significantly higher in the Parish than at the regional level.

ii. **Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.**

- (a) High Access areas are concentrated in and around the cores of Mandeville and Covington for most opportunity indicators.
- (b) Low Access areas are concentrated outside of urban cores and in and around the more rural areas, specifically around Bush and northwest of Covington.

2. *Additional Information*

a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.**

There is a need to locate more housing near educational opportunities, such as the new flagship Northshore Technical Community College (NTCC) campus, but state policy prohibits Louisiana Community and Technical Colleges from providing dorms or other housing on their campuses. NTCC student's average age is 26, and they are often heading households with children. Even if state policy was changed, NTCC would need to provide some housing for families. St. Tammany Parish is currently seeking potential developers to provide affordable and student housing near this campus. Housing would need to accommodate families, as most students attending North Shore Technical Community College (NTCC) have children.

At the K - 12 level in Madisonville, which has the greatest growth in the jurisdiction, over 40% of students receive free or reduced lunch rates.

Lack of stable housing, transportation choices, childcare availability, and behavioral healthcare are barriers to job access. The Parish has companies that offer high wage jobs, and then many service-sector jobs such as retail and restaurant services jobs. Middle skill jobs are insufficient and the community engagement process indicated that many employees including teachers, first responders, deputies, LPNs and others live outside the parish and commute due to cost of housing.

b. **The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).**

The Madisonville area Public School system and many other schools in STP provide special education services, and before- and after-care are draws for parents. Pelican bus service provides

transportation for employees to reach both New Orleans business district and the Elmwood area. There is a fee for this service. Uber and Lyft are available and expanding, but expensive. STAR transportation partially funded by the Parish has greatly improved their service. In just the first six months of this year STAR completed 47,000 trips compared to only 46,000 for the entire year last year. Rental housing options have increased in the past decade, but the rent is not affordable for some. St. Tammany is a rural parish, which helps residents qualify for RD-502 home loans. At the current rate of growth, the parish, however, could soon grow out of its designation as rural. Most assisted living and senior housing development have on-site transportation, and those cohabitated living environments take some pressure off the limited multifamily market.

3. *Contributing Factors of Disparities in Access to Opportunity*

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

To varying degrees, the following factors impact access to opportunity in St. Tammany Parish:

- Lack of access to opportunity due to high housing costs
- Location and type of affordable housing
- Availability of public transportation.
- Impediments to mobility including need for complete streets
- Access to child care
- Need for additional middle-skill jobs
- Wetlands, land use and zoning laws
- Location of employers and services
- Access to health care, especially mental health services
- Location of proficient schools
- Access to financial services

iv. *Disproportionate Housing Needs*

1. *Analysis*

a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?

According to Table 9, 29.4% of all St. Tammany Parish households experience at least one of the four housing problems. Native American and “Other” households are most likely of all protected class groups at 56.7% and 55.0% respectively. white households are least likely to experience any of the four housing problems at 26.8%.

Native American and “Other” households are most likely of all protected class groups to experience any of the four severe housing problems, at 50.9% and 25.9% respectively. white households are the least likely at 11.9%. Non-family households (39.2%) are more likely to experience one of the four housing problems than family households (24.8% for less than five people, 32.4% for five or more).

In the New Orleans-Metairie region, black, non-Hispanic households are most likely to experience at least one of the four housing problems at 49.8%. “Other” households are slightly less likely than black households at 46.8%. white households are the least likely to experience any of the four problems at 28.0%. Of all households in the region, 36.6% experience at least one of the four housing problems. Similarly, black households are most likely to experience any of the four severe housing problems at 30.3%, and white households are least likely at 13.7%. Overall, household types are <5 people (30.3%), 5+ people (46.2%), and Non-family households (44.1%).

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

The jurisdiction census tracts that experience the greatest housing burdens are 40501 (43.3%), 41204 (43.1%), and 040803 (40.3%). These areas have some of the highest exposures to poverty and have some of the highest populations of people of color. These areas are also approximately half-white and experience low segregation rates.

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.

Table 9 indicates that over 14,500 family households experience any of four housing problems - 29% of all households are experiencing problems.

According to Table 11, 14 households with children occupy Public Housing, and 36 Public Housing units have 2 bedrooms or more, indicating adequate supply of multi-bedroom units to meet current public housing residents’ needs. However, public input during the AFH process revealed that the waiting list for households wishing to enter public housing is prohibitively long.

207 HCV program households have children, and 270 participating units offer 2 or more bedrooms. However, similar feedback was shared in the engagement process regarding the lack of availability of HCVs to interested households: waiting lists are too long for those in need to feel hope of accessing a voucher anytime in the near future.

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

In St. Tammany Parish, white, Non-Hispanic residents are 87.3% of homeowners and 70.7% of renters. Black, non-Hispanic residents are 7.6% of homeowners and 18.0% of renters. Hispanic residents are 2.8% of homeowners and 7.0% of renters.

In the New Orleans-Metairie Region, white residents are also the majority of homeowners at 67.1% and the second highest of renters at 40.5%. Black residents are the majority of renters at 45.5% and the second highest of homeowners at 24.6%.

2. Additional information

The high rates of homeownership and low availability of multifamily were mentioned as barriers for low-income households in St. Tammany Parish. In addition, most of the multifamily rental properties currently under construction are luxury properties that are not affordable for low-to-moderate income households. Due to the parish's demographics, developers have difficulty securing tax incentives such as Low Income Housing Tax Credits.

3. Contributing factors

To varying degrees, the following factors influence disproportionate housing needs in St. Tammany Parish:

- Resources for Affordable Housing Development
- Maintenance Challenges for Aging Housing
- Prevalence of Single-Family Ownership Housing
- NIMBYism
- Access to Publicly-Supported Housing for Persons with Disabilities
- Floodplains and Wetlands
- Property Maintenance Code Adoption

See Section G for contributing factors for City of Slidell.

C. Publicly supported housing analysis

1. Analysis

a. Publicly supported housing demographics

i. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?

According to Table 6, black households are more likely to reside in Public Housing and HCV Program-participating units. They comprise 97.8% and 69.5%, respectively, of all households in these categories.

White households are most likely to occupy Project-Based Section 8 and Other Multifamily housing. They comprise 95.2% and 84.6%, respectively, of all households in these categories.

Only 1 Asian or Pacific Islander household resides in Publicly Supported Housing (Other Multifamily).

ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

Greater shares of white, Hispanic and Asian or Pacific Islander households occupy Public Housing in the region than in the Parish. They comprise 3.8%, 1.6%, and .1%, respectively, of these households in the region, compared to 2.2%, 0% and 0% in the Parish.

Black households occupy the majority of Project-Based Section 8 units (69.7%) in the region, compared to 0.6% in the Parish.

Similar to the Parish, white households reside in the majority of Other Multifamily units (50.5%) in the region, but greater percentages of black (41.8%) and Hispanic (7.1%) households occupy these units in the region than in the Parish.

HCV Program participants are much more diverse in the Parish than in the region, in which 93.6% of all households are black, compared to 69.5% in the Parish.

iii. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

83.7% of parish households are white, but they comprise smaller shares of low- to moderate-income households. Of households earning less than 80% of the area median income (AMI), 68.7% are white. Of those earning less than 50%, 59.7% are white. Of those earning less than 30% of AMI, 70.9% are white. White households are therefore overrepresented among Project-Based Section 8 units (95.2%) and Other Multifamily units (84.6%).

9.8% of Parish households are black, but they comprise larger shares of Parish households earning less than 30%, 50%, and 80% AMI (18.3%, 16.8%, and 15.5%, respectively). Black households are therefore overrepresented among Public Housing units (97.8%) and in the HCV Program (69.5%).

3.6% of Parish households are Hispanic, but they comprise larger shares of Parish households earning less than 30%, 50%, and 80% AMI (4.4%, 4.7%, and 4.0%, respectively). Hispanic households are therefore overrepresented among Other Multifamily units (6.3%).

1.0% of Parish households are Asian or Pacific Islander, but they comprise smaller shares of Parish households earning less than 30%, 50%, and 80% AMI (0.4%, 0.5%, and 0.7%, respectively).

b. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

Only one public housing site is located in St. Tammany Parish - the Helen Frick/Harry Owens Villas adjacent to the West 30s neighborhood in the City of Covington. This neighborhood has one of the highest concentrations of black residents in the Parish. 44.9% of residents are black, compared to 10.6% in the Parish.

The one project-based Section 8 housing development- the Rouquette Lodge in Mandeville -is located on the boundary of census block groups with 87.9% and 94.2% white population. An “Other Multifamily” development is located at the same site. One additional Other Multifamily site - Salvation Manor Apartments - is located in the relatively integrated census block group in Pearl River; 76% of residents are white, non-Hispanic.

Housing choice vouchers are concentrated most heavily in census tracts 40803 (9.2% of households) east of Slidell, 41102 (7.7%) to the west of Slidell, and 40501 (6.4%) and 40502 (5.9%) to the north of downtown Covington, which holds a greater concentration of black households than all other areas of St. Tammany Parish.

LIHTC developments occur more evenly throughout the Parish, in Folsom, Abita Springs and Covington.

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

According to Map 5, 30% of households in the Helen Frick/Harry Owens Villas have children. The development is adjacent to the West 30s neighborhood in the City of Covington, which has one of the highest concentrations of black residents in the Parish. 45% of residents are black.

The Rouquette Lodge, which provides housing for elderly persons and persons with disabilities, is located on the boundary of census block groups with 87.9% and 94.2% white, non-Hispanic population.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

St. Tammany Parish does not include any R/ECAPs.

iv. A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

According to Table 8, Salvation Manor residents are 80% nonwhite, compared to 14% in St. Bernard III and 6% in Rouquette Lodge III. However, only 15 units are located at this development.

iv. (B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

There is no additional relevant information.

v. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

According to Map 5, 96% of households in the Helen Frick/Harry Owens Villas are black. 30% have children. The development is adjacent to the West 30s neighborhood in the City of Covington, which has one of the highest concentrations of black residents in the Parish. 48% of residents in the census tract in which the development is located are black.

The Rouquette Lodge, which provides housing for elderly persons and persons with disabilities, is comprised of three separate developments, with white households ranging from 94% to 96% of occupants. 88% of households within this census tract are white.

Black households comprise 80% of households at Salvation Manor yet only 16% of those within its census tract.

c. Disparities in Access to Opportunity

i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Locations of publicly supported housing are mostly concentrated near the small urban centers of Covington, Mandeville and Slidell. Access to jobs, services and public transportation is greater in these areas. Residents located in rural areas, however, are more dependent on private transportation in order to access these, given limited rural public transit service. Residents of publicly supported housing in these areas, such as the Salvation Manor Apartments in Pearl River, are therefore more likely to have difficulty accessing these opportunities.

Perhaps of greater concern to linking publicly supported housing residents to opportunity is simply the challenge of creating new publicly supported housing units, given the lack of affordable, non-wetland land zoned for multifamily development, and lack of general community awareness of need, business community involvement and building moratoriums in unincorporated St. Tammany Parish.

2. Additional info

a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD- provided data.

No additional information is available.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

The community engagement process revealed resident frustrations with the limited availability of publicly supported housing in St. Tammany Parish. This included the lack of any housing choice voucher availability from the Covington Housing Authority. Residents also cited lack of responsiveness among CHA staff to housing inquiries.

The Parish's low poverty rate and absence of R/ECAPs limits the competitiveness of LIHTC-funded developments.

3. Contributing factors of publicly supported housing location and occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Factors affecting the severity of fair housing issues related to publicly supported housing include the following:

Factors	Segregation	Disparities in Access to Opportunity	Disproportionate Housing Needs
NIMBYism	X		X
Wetlands, land use and zoning laws	X	X	
Resident Opposition to Development Based on Class and Race	X		

Lack of Access to Opportunity Due to High Housing Costs		X	
Access to Publicly-Supported Housing for Persons with Disabilities			X

D. Disability and Access Analysis

1. Population Profile

a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

According to Table 13, people with disabilities represent a slightly smaller share (less than 0.7 percentage point differential) of the total population in the Parish than in the region across all categories except those with hearing difficulty, who make up 4% of Parish residents, compared to 3.6% of the region's residents.

Map 14 shows that residents with disabilities of all types are well distributed throughout the Parish. This suggests a higher rate of disability in less densely populated areas. In the remainder of the region, people with disabilities are largely concentrated in Orleans and Jefferson Parishes.

b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

Census tract 41101, located between Slidell and Lacombe, has the highest rate of children age 5-18 with a disability (5.9%). Those between the ages of 18 and 64 are concentrated in the eastern side of the Parish, in tracts 41102 (13.9%), 40709 (13.5%), 40706 (13.5%), and 40704 (12.9%). Those age 65+ are concentrated in tract 40601 (12.1%), between Madisonville and Covington, and in tracts 40709 (10.7%) and 40706 (9.6%) on the east side of the Parish.

2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

According to local affordable housing development and placement agencies, there is a lack of affordable, accessible housing in a range of unit sizes in St. Tammany Parish. 21% of 236 AFH survey respondents selected "Create more ADA-accessible housing throughout the Parish in all neighborhoods" in response to the question "What do you think local government should do to address housing discrimination?" Half of the 30 survey respondents who indicated they have a disability chose this response.

b. Describe the areas where affordable, accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

Several apartment complexes in Covington offer multifamily, accessible, income-restricted housing, including Palmetto Greens, the Groves at Mile Branch, Maple Ridge, and Pine Crest Apartments. The Groves is located adjacent to the West 30's neighborhood in the City of Covington, which has the highest concentration of African American households in the parish. There are no R/ECAPs in the parish.

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

According to Table 15, people with disabilities make up a greater share of residents in publicly supported housing than they do of the total population at both the parish and regional scale. One exception is Other Multifamily properties in the parish, in which people with disabilities comprise only 3.4% of residents.

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Because most housing choices in the parish are low-density, single-family dwellings, integrated settings in the parish are limited to multifamily facilities that offer ADA-accessible units. Most such apartment complexes are located in the City of Slidell and its environs. With funding provided by a Parish property tax millage, STARC provides services to persons with developmental disabilities, including group housing.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

The Covington Housing Authority and Slidell Housing Authority offer accessible housing to persons with disabilities in the form of traditional public housing units and Housing Choice Vouchers. The Florida Parishes Human Services Authority, START, NAMI, and VOA provide supportive living services to individuals with developmental disabilities living independently, as well as community/group homes.

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

i. Government services and facilities

Government services are located in ADA-compliant facilities throughout the Parish. The Parish is distinguished by its offering of an inclusive playground accessible to kids of all abilities. It is located at the Tammany Trace Trailhead at Koop Drive in Mandeville and Camp Salmon Nature Park.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Many of the parish's arterial and local streets lack pedestrian infrastructure, including sidewalks, crossings and signals. Exceptions are in the centers of historic towns, such as Covington, Mandeville and Abita Springs. Commercial land uses and services are concentrated around highways owned by the state, which typically does not construct sidewalks in road projects, and especially in suburban and rural areas, which are prevalent in the parish.

iii. Transportation

Public transportation is limited to a demand-response service (STAR Transit) that requires reservations be made at least 24 hours in advance, and which limits recurring, scheduled trips and is not typically able to provide more than one round-trip per day to individuals. Urban service is unavailable on Sundays and between 6pm and 6am on other days. Rural service is unavailable on weekends, and between 5pm and 7am on weekdays. 46% of survey respondents with a disability said "Lack of transit (accessible, affordable, walking distance)" was a "major barrier" to finding a safe and affordable home in a preferred neighborhood. Said one respondent, "There is no mass transit for a disabled person who may want to move into a better neighborhood. Many of the better neighborhoods are too far away from grocery, drug store, Wal-Mart etc."

iv. Proficient schools and educational programs

Census tracts with the lowest school proficiency index values are 40701 (17), 41102 (17), 41101 (17), and 41102 (20). Census tract 41101, located between Slidell and Lacombe, has the highest rate of children age 5-18 with a disability (5.9%) in the Parish, and also the lowest school proficiency index value. However, two of the schools that serve this area – Henry Mayfield Elementary (Pre-Kindergarten - Grade 6) and Bayou Woods Elementary (Pre-Kindergarten – Grade 3) – received "B" letter grades from the Louisiana Department of Education in 2016. Carolyn Park Middle School (Grades 4-6), which also serves census tract 41101, received a "C" grade. 20.7% of survey respondents with a disability said schools in their neighborhood are "fair" or "poor," compared to 18.9% of survey respondents without a disability.

v. Jobs

30% of survey respondents with a disability said good job opportunities in their neighborhood are "poor," compared to 15.3% of survey respondents without a disability.

50% of survey respondents with a disability said "Lack of access to good jobs" is a "major barrier...to finding a safe and affordable home" in a preferred neighborhood, compared to 24.7% of survey respondents without a disability.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

Many adult residents require assistance with retrofitting homes for accessibility, such as installing access ramps and grab bars. However, it is difficult to find affordable home repair services, due to the lucrative homebuilding industry in the parish. DHHS disseminates information on home repair and improvement resources available to persons with disabilities provided by partner agencies, such as Volunteers for America, STARC, SNAP, Disaster Rehab Programs, NDRI, and World Changers which conduct accessibility improvements for low-income residents with disabilities.

The Florida Parishes Human Services Authority is a state-established local government agency that offers services to persons with addictions, developmental disabilities, and behavioral illness. It offers permanent supportive housing vouchers for the disabled.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

The high cost of housing in the parish is a primary barrier to homeownership, and this is more so the case for persons with disabilities, given that incomes among this group tend to be lower. The American Community Survey 2016 1-year estimate of the median home value in the Parish was \$210,700 - one third higher than the statewide median of \$158,000.

Home prices are especially high in the western side of the parish, which includes the cities of Abita Springs, Covington, Madisonville and Mandeville. According to the *New Orleans and Northshore Region Real Estate Market Analysis*, the average sale price of an existing home rose by 24% over the last five years in East St. Tammany Parish (which incorporates Slidell), reaching \$189,232 in 2016. In West St. Tammany Parish, the average sale price of an existing home in 2016 was far higher at \$280,069, having risen by 14% over the last five years.

The Parish partners with Northshore Housing Initiative, Habitat for Humanity East and West to identify potential homeowners in the Habitat organization's programs. Habitat for Humanity East closed on homes with four new owners in 2016 and 2017. Their homes average cost is \$85,000, with mortgage payments around \$450, including principal, taxes and insurance. Habitat East does not charge interest.

Habitat for Humanity West sold 16 homes in 2016 and 2017, averaging \$145,416.

Northshore Housing Initiative sold 8 homes in 2016-2017 at an average cost to homeowners of \$109,920.

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

The AFH survey revealed stark differences in housing needs between those with disabilities and those without. 25.9% of those with disabilities rent, compared to 11% of those without. 32.3% of respondents with disabilities reported being “somewhat” or “very dissatisfied” with their current quality of housing, compared to 7.3% of respondents without disabilities. In response to the question, “Have you had, or do you have, trouble finding safe, quality housing that you could afford in a neighborhood you would like,” 53.3% of the 31 respondents with a disability responded “yes,” compared to 30.6% of the 222 respondents without a disability.

6. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.

No additional information is available.

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

No additional information is available.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify actors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

Factors impacting the severity of fair housing issues related to disability and access issues include the following:

Factors	Segregation	Disparities in Access to Opportunity	Disproportionate Housing Needs
NIMBYism	X		X
Property Maintenance Code Adoption	X		X

Need for Public Investment in Specific Neighborhoods Including Services or Amenities	X		
Location and Type of Affordable Housing	X		
Insufficient Knowledge about Fair Housing Enforcement and Resources	X		
Lack of Access to Opportunity Due to High Housing Costs		X	
Availability of Public Transportation		X	
Impediments to Mobility including Need for Complete Streets		X	
Access to Health Care, Especially Behavioral Health Services		X	
Maintenance Challenges for Aging Housing			X

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved:

- a. ***A charge or letter of finding from HUD concerning a violation of a civil rights-related law;***
- b. ***A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;***
- c. ***Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;***
- d. ***A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;***
- e. ***A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or***

f. A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

St. Tammany Parish does not have any unresolved instances of items A - F above.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The Louisiana Equal Housing Opportunity Act (La. R.S. 51:2601, et seq.), passed in 1991, is substantially equivalent with the Federal Fair Housing Act. It does not protect any characteristics in addition to the federal law. The Louisiana Department of Justice administers and enforces the Equal Housing Opportunity Act.

Though not a part of the Louisiana Equal Housing Opportunity Act, the State did pass housing protections for victims of domestic violence in 2015. The Louisiana Violence Against Women Act (LaVAWA) provides four key protections:

- Anyone in need of emergency assistance can contact the police without penalty.
- Victims of domestic violence can no longer be evicted because of the violence of an abuser.
- Victims can no longer be denied housing solely on the basis of past abuse.
- Victims can now terminate a lease early and move when necessary to ensure their safety.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Established in 1995, the Greater New Orleans Fair Housing Action Center (GNOFHAC) is a nonprofit civil rights organization dedicated to eradicating housing discrimination in Louisiana. Its work includes education, investigation and enforcement activities. Its staff of over a dozen includes intake specialists, policy analysts, engagement coordinators and attorneys. GNOFHAC has filed enforcement actions against individuals and apartment complexes in St. Tammany Parish that have resulted in successful settlements. The Department of Health and Human Services and the Community Action Agency (CAA) in Slidell and Covington provide Fair Housing information. CAAs perform housing inspections with prospective tenants to insure that the housing meets the Habitability Checklist provided by the Louisiana Housing Corporation. These are the minimal standards. The Louisiana Attorney General's office provides enforcement in cases involving tenants and landlords, as does the Greater New Orleans Fair Housing Action Center.

4. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

DHHS staff works with local nonprofit agencies to distribute affordable housing resource information, including information regarding its home repair and sewer system upgrade programs. Through these relationships, Parish staff have been able to remain aware of the evolving needs of parish residents.

St. Tammany Parish currently does not have a property maintenance code, which means it does not have the ability to inspect homes for code violations outside of standard procedures pertaining to applications for occupancy permits.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

St. Tammany Parish and the City of Slidell held a Fair Housing Symposium for a day at the Slidell Municipal Auditorium in April 2017. Realtors, property owners, landlords, officials, law enforcement, banks, mortgage and title companies, tenants, nonprofit housing professionals, etc., attended.

The Parish hosted the “Make A House Your Home” homeownership events scheduled on both the West and East side of the parish. 20 vendors attended to bring information to individuals and families who were interested in homeownership. The Parish has also worked with veterans to secure the Danielle Inn as a shelter for homeless veterans outside of Covington and with Louisiana Prison Reentry Initiative to plan for returning citizens’ housing needs, and sought and identified funds for group homes for mentally ill men and women at the “single point of entry” Safe Haven campus.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

Factors affecting the severity of fair housing issues related to fair housing enforcement, outreach capacity, and resources include the following:

Factors	Segregation	Disparities in Access to Opportunity	Disproportionate Housing Needs
Property Maintenance Code Adoption	X		X
Insufficient Knowledge about Fair Housing Enforcement and Resources	X		

Maintenance Challenges for Aging Housing			X
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F. 1,250 Units or fewer PHA Insert

NOT APPLICABLE

This section is only to be completed when a PHA with 1,250 or fewer combined public housing units and housing choice vouchers partners with a Local Government, when the Local Government is the lead entity in the joint or regional Assessment of Fair Housing. A collaborating PHA's analysis of fair housing issues in its Assessment of Fair Housing may either be conducted by using this section or sections V.A.-E. of the Assessment Tool for its service area and region, along with all other sections in this Assessment Tool, and as directed by the questions and instructions.

G. \$500,000 or Less Local Government Insert

1. Demographic Summary

Describe demographic patterns in the jurisdiction (and region, if applicable). Explain how demographic trends have changed over time?

The City of Slidell's population has declined since 1990, falling from 21,293 to 18,859.

Since 1990, Slidell has been home to a smaller percentage of non-white, non-Hispanic residents than the region, though this population has increased in proportion to white, Non-Hispanic residents in both. According to Table 1, 26.8% of Parish residents are non-“white, Non-Hispanic,” compared to 46.3% in the region. These figures have grown from 1990, when rates were 14.2% and 40.7%, respectively. Growth in minority population has been largely driven by Hispanic and black, non-Hispanic residents. The Hispanic population grew from 2.6% of the city population in 1990 to 6.3% in 2010, and the black, non-Hispanic population grew from 10.6% to 16.8%.

The city's foreign-born population has increased from 2.1% to 3.6%. However, this remains well below the current regional share of 7.3%. This is also the case with limited English proficiency population, which grew from 1.0% to 2.1% in the Parish, but which is 4.4% of the region's population.

The city has also aged. Children declined from 28.8% in 1990 to 25.4% today, though this group remains greater than the regional share of 23.4%. Meanwhile, the share of people aged 65+ jumped from 10.6% to 14.5% - higher than the regional share of 12.2% in 2010. The total share of families with children declined from 52% to 43.7% in the parish, closer to today's regional share of 42.3%.

2. Segregation/Integration

a. Describe any areas of segregation and integration in the jurisdiction (and region, if applicable). Identify the protected class groups living in any such areas. Explain how area of segregation have changed over time.

Based on the dissimilarity trends in Table 3, the City of Slidell has had low segregation across all recorded races considering the index value is consistently below 39. Based on this break down non-white/white has low segregation with a current dissimilarity trend of 30.81, Black/white is 38, Hispanic/white is 23.7, and Asian or Pacific Islander/white is 32.36. However considering 74% of the population is white/non Hispanic and only 16% is black/non Hispanic, 5% is Hispanic and 1% is Asian, these dissimilarity numbers in reality would represent a higher rate of segregation.

In reference to Table 3, dissimilarity trends in the City of Slidell have consistently fallen since 1990, in 2010 all racial groups are reported low segregation. The Hispanic/white dissimilarity index has been the lowest in Slidell with a 1990 trend of 9.00, a 2000 trend of 8.31, a 2010 trend of 17.37 and a current trend of 23.71. Asian or Pacific Islander/white has consistently been low with a 1990 trend of 20.32, a 2000 trend of 13.43, a 2010 trend of 16.96 and a current trend of 32.36. The black/white index was the only racial index that has gone above low segregation into high with the 1990 trend of 57.29. The dissimilarity trend however steadily went down with the 2000 trend of 49.83 and has gone down to low in 2010 with a 32.84 trend and currently with a 38.03 trend. The Non-white/white index was the only other race that went above low segregation with a 1990 trend of 44.81, however steadily declined with a 2000 trend of 37.85, 2010 trend of 25.69 and a current trend of 31.33.

The Greater New Orleans Fair Housing Action Center recently conducted ten paired fair housing tests in Slidell—with one white and one African American tester—posing as prospective tenants and inquiring about apartment availability. Testers were matched to ensure that they had similar incomes, career paths, family types, and rental histories. The primary difference between the two testers was race. In four out of ten tests, we noted discriminatory treatment of the African American tester.

b. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

The following could lead to increased rates of segregation: minimum lot size requirements, lack of multifamily-zoned areas, construction moratoriums in unincorporated St. Tammany Parish, high percentage of single family homes, and lack of affordable housing for families (2 bedrooms or more). In addition, a high percentage of families experiencing the four main housing problems (incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%) will aid in the increased rates of segregation. Public perception of affordable

housing and transit as nuisances also thwarts new housing construction. The Parish and City of Slidell have no R/ECAPs, which makes it difficult for developers to access LIHTC funds. The households in need, however, cannot find affordable housing because they are extremely-to-very-low-income. Many jobs in the Parish are low-wage, and commuting outside the Parish is sometimes necessary to find well-paying jobs. Additionally, workers and students are not always prepared for higher wage jobs.

3. R/ECAPs

Describe the locations of R/ECAPs, if any, in the jurisdiction (and region, if applicable). Identify the protected class groups living in R/ECAPs and describe how R/ECAPs have changed over time.

According to Maps 1, 3, 4, and Table 4 there are no R/ECAPs in Slidell. In the region, the R/ECAPs are currently 81% U.S. born; predominantly black non-Hispanic; and English-proficient. The region is predominantly U.S. born; white, Non-Hispanic; and English-proficient. Since 1990, the R/ECAPs in Orleans Parish have remained largely unchanged. Some areas have shifted slightly. Most notably, Census Tract 001751, which is a large swatch of New Orleans East, was a R/ECAP in 1990, 2000, and currently. In 2010, it was not a R/ECAP. In 2010, two census tracts in Jefferson Parish became R/ECAPs. Currently, three census tracts in Jefferson Parish are R/ECAPs. Additionally, St. John the Baptist Parish currently has one R/ECAP in one census tract.

4. Disparities in access to opportunity

1. Analysis

a. Education

The City of Slidell has similar access to proficient schools as residents in the New Orleans-Metairie region but has lower access to proficient schools compared to St. Tammany Parish. In the jurisdiction's total population, white, non-Hispanic and Asian or Pacific Islander (API) groups have the most access to proficient schools. The black, Non-Hispanic population has the lowest access to proficient schools (index score of 47) but is not much higher than the access Hispanic and Native American, non-Hispanic groups (50).

Map 7 shows that access to proficient schools is related to residential living patterns. Proficiency levels are typically found in clusters so that lower proficiencies are close to one another. It appears the more proficient schools are more often found in neighborhoods that are predominantly white, Non-Hispanic, while lower performing schools tend to be in neighborhoods with higher non-white populations. Regionally, it appears that school proficiency is best in areas directly outside urban cores.

While Table 12 shows average access to proficient schools, community participation and local data calls for the need to improve school quality throughout the city. The 2016 Louisiana School

Performance scores from the Louisiana Department of Education reports 7 schools in Slidell receiving a C grade. In addition, the Education and Employment Focus Groups reported below average math and science abilities in the workforce and at the local community college. The City of Slidell Year 1 Annual Plan for 2015 comments that poverty affects educational outcomes.

b. Employment

Data from Table 12 shows that Slidell residents have slightly higher access to jobs compared to those of the region. In the jurisdiction's total population, Asian or Pacific Islander (API) and Hispanic groups have the most access to jobs. The table shows the white, Non-Hispanic population to have the lowest access.

In reference to Map 8, the protected class groups living in the City of Slidell have better access to employment than access throughout the region. In the region as one travels out of the urban cores the access to employment decreases. Within the City of Slidell the access to employment is consistently high except when you begin to leave the city's urban core. In tracts 41004, 41104, and 41003, which are located on the edge of the city, the access is lower, ranging from 11-30, while census tracts in the center of the city have a job proximity index of 97.

While Table 12 shows relatively high access to jobs, community participation and input from focus groups reports the opposite. Results from the AFH survey reveal that the greatest barriers to finding safe and affordable housing in a neighborhood of one's preference were: a lack of access to good jobs; lack of affordable housing and not having enough money for rent; and lack of transportation. Multiple residents provided comments for the comment cards that referenced the lack of access to jobs, particularly jobs that paid enough to afford housing. One resident mentioned that they had to work 3 jobs but still could not afford rent. The City of Slidell Year 1 Annual Plan for 2015 also called for the need to create jobs as a part of long-term community development goal to improve the quality of life for low-income persons.

c. Transportation

Slidell residents have much lower access to transit than those of the region. There is, however, a relatively small disparity between groups within Slidell's total population. Based on HUD Table 12, access to transportation is as follows:

- Asian or Pacific Islander population has the greatest access to transportation (35.59)
- Closely followed by the white, Non-Hispanic population (35.11)
- Hispanic population is third (34.54)
- Black, Non-Hispanic is fourth (34.38)
- Native American population has the least access (33.26)
- The black, non-Hispanic group has the most access to low transportation cost while the Asian or Pacific Islanders, Native Americans and white/Non-Hispanic groups have the same percent of access.

Map 11 shows that the cost of transportation for the protected classes is relatively high throughout the City of Slidell. Considering there isn't a fixed-route transit system in the City of Slidell or throughout St. Tammany Parish, it is understandable that the cost of transportation is high. Land use patterns tend to be low-density and segregated by use throughout the City of Slidell and the Parish, which contributes to the high cost of transportation. In comparison to the region, in which two major fixed route systems operate, there is a notable difference in access to transportation. In the New Orleans-Metairie Region access to transportation index is in the upper 90s while in the City of Slidell/St. Tammany region the index is in the 20s.

In the AFH online survey for St. Tammany and Slidell, one of the greatest barriers to finding safe and affordable housing in a neighborhood of one's preference was a lack of access to transportation along with not having access to good jobs, affordable housing and not having enough money for rent. In addition, participants of the Transportation Focus Group and public meetings reported challenges with a lack of a fixed route system. Many older residents commented that it is challenging to utilize the transit system due to the need to secure vouchers and make appointments that coincide with the times when they need to use the system.

d. Access to Low Poverty Neighborhoods

The City of Slidell has similar exposure to Low Poverty Neighborhoods as the region. In this exposure, the parish also experiences less disparity among protected class groups. In St. Tammany Parish:

- The black, non-Hispanic group has the highest exposure to poverty at 47.15 (in this index the higher the score, the less exposure to poverty)
- The Hispanic group has the next highest exposure at 50.35
- The Native American, non-Hispanic group has a similarly high exposure at 50.88
- The white, non-Hispanic group has a slightly lower exposure to poverty at 55.61
- Asian or Pacific Islanders, non-Hispanic (API) have the least exposure to poverty at 63.74

The region has similarities to the level of exposure given that in both cases the black population has the highest exposure to poverty. However, the remaining protected classes vary in exposure order.

Map 12 shows that census tracts in the City of Slidell have the highest rates of poverty in the Parish, and suggests that the areas in the City of Slidell with a higher percentage of poverty also have a higher percentage of residents in protected class groups.

e. Access to Environmentally Healthy Neighborhoods

Residents in Slidell share low access to environmentally healthy neighborhoods, consistent with residents throughout the region. The low access is similar across all protected classes, with the greatest disparity between Native American, non-Hispanic residents (32.96) and black, non-Hispanic (31.77). All other groups vary slightly within 23.87 and 27.48 range.

In reference to Map 13, the City of Slidell has a higher percentage of access to harmful toxins. In Map 13, the higher the index value, the less exposure to toxins that are harmful to human health. Therefore, the protected class in Slidell are being exposed to a greater rate of hazards considering

the health index is so low. Most index values throughout Slidell range from 13 to 30. In St. Tammany Parish the index is on average high, which means that the environmental quality of the neighborhoods is better than that of Slidell. The New Orleans-Metairie, LA Region has lower Health Index scores closer to 20.

Two previous Superfund National Priorities List sites are located in Slidell: the Southern Shipbuilding site and the Bayou Bonfouca site. According to the U.S. Environmental Protection Agency, the Southern Shipbuilding site is a 56-acre former barge cleaning, building, docking and repair facility that contaminated soils, sediments and sludges until it ceased operation in 1993. EPA cleaned the site and removed it from the NPL in 1998, but remains under federal control. It is surrounded by low-density residential neighborhoods and undeveloped land, approximately 1 mile to the west of the city center. A creosote plan operated at the 54-acre Bayou Bonfouca site located immediately west of the city center until 1972 and contaminated soil, sediment and groundwater. EPA cleaned the site in 1997, though groundwater treatment is ongoing. The State operates and maintains access to the site, which today is Heritage Park.

5. Disproportionate Housing Needs

Describe which protected class groups in the jurisdiction (and region, if applicable) experience higher rates of housing problems (housing cost burden, severe housing cost burden, substandard housing conditions, and overcrowding).

According to Table 9, 35.2% of all Slidell households experience at least one of the four housing problems. Native American, Non-Hispanic and “Other”, Non-Hispanic households are most likely of all protected class groups at 78.7% and 70.7% respectively. white, Non-Hispanic households are least likely to experience any of the four housing problems at 31.1%. Additionally, Native American households are most likely of all protected class groups to experience any of the four severe housing problems at 58.5%. “Other, Non-Hispanic” households are the least likely at 10.1%. Overall, household types are <5 people (24.8%), 5+ people (32.4%), and Non-family households (39.2%).

6. Contributing Factors of Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs

Consider the factors listed that are generally applicable to Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of one or more fair housing issues. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

To varying degrees, the following factors impact access to opportunity in the City of Slidell:

- Lack of access to opportunity due to high housing costs
- Location and type of affordable housing
- Availability of public transportation

- Impediments to mobility, including lack of Complete Streets
- Access to child care
- Need for additional middle-skill jobs
- Wetlands, land use and zoning laws
- Location of employers and services
- Access to healthcare, especially mental health services
- Location of proficient schools
- Access to financial services

7. Publicly supported housing Section

A. *Publicly supported housing demographics*

Compare the demographic populations by protected class group of residents living in each category of publicly supported housing with the demographics of the population in general in the jurisdiction (and region, if applicable). Are certain protected class groups more likely to be residing in one program category of publicly supported housing than other program categories?

According to Table 6, black households are more likely to reside in Public Housing and HCV Program-participating units. They comprise 76.60% and 87.50%, respectively, the majority of households in these categories. Black households also occupy the majority of the Project-Based Section 8. white households are most likely to occupy the other Multifamily housing. They comprise 90%, respectively, all households in this category. Only 1 Hispanic household resides in Project-Based Section 8 Housing.

Greater amounts of Hispanic and Asian or Pacific Islander households occupy Public Housing in the region than in the City of Slidell. They comprise 1.6%, and .1%, respectively, of these households in the region, compared to 0% and 0% in the City.

Black households occupy the majority of Project-Based Section 8 units (69.7%) in the region - less than the 90% in the Parish.

Similar to the City, white households reside in the majority of Other Multifamily units (50.5%) in the region, but greater percentages of black (41.8%) and Hispanic (7.1%) households occupy these units in the region than in the City.

93.6% of all HCV Program participants are black, similar to the region, in which 87.5% of HCV Program households are black.

B. *Publicly Supported Housing Location and Occupancy*

i. Describe the location of publicly supported housing in relation to areas of segregation and R/ECAPs in the jurisdiction (and region, if applicable).

- a. None in Slidell
- b. 43 census tracts in Orleans Parish
- c. 3 in Jefferson Parish
- d. 1 in St. John the Baptist

ii. If there are R/ECAPs, describe any differences in the demographics, including by protected class group, of assisted households who live in R/ECAPs versus those who live outside of R/ECAPs in the jurisdiction (and region, if applicable).

While there are no R/ECAPs in Slidell, the region's R/ECAPs are currently 81% U.S. born, black, non-Hispanic, and English proficient. The region is predominantly U.S. born, white, non-Hispanic, and English proficient.

iii. Compare the demographics, by protected class group, of each program category of publicly supported housing to the demographic composition of the areas in which they are located in the jurisdiction (and region, if applicable).

77% of the City of Slidell's households are white, but they comprise smaller shares of Parish households earning less than 30%, 50%, and 80% AMI (52.45%, 54.89%, and 62.8%, respectively). white households are therefore overrepresented among Other Multifamily units (90%).

15% of the City of Slidell's households are black, but they comprise larger shares of City households earning less than 30%, 50%, and 80% AMI (33%, 22.9%, and 21.89%, respectively). Black households are therefore overrepresented among Public Housing residents (90%) and in the HCV Program (87.5%).

5.75% of the City of Slidell's households are Hispanic, but they comprise larger shares of City households earning less than 30%, 50%, and 80% AMI (9.41%, 7.43% and 5.98%, respectively). Hispanic households are only represented in Project- Based Section 8 (2%).

0.52% of Slidell's households are Asian or Pacific Islander; they comprise small shares of City households earning less than 30%, 50%, and 80% AMI (1.4%, 0.84%, and 0.7%, respectively).

C. Disparities in Access to Opportunity

i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction (and region, if applicable), including within different program categories of publicly supported housing.

As the largest city in St. Tammany Parish, Slidell is home to a concentration of jobs and services. Most publicly supported housing is located in this urbanized area, making access to services more viable than for residents of publicly supported housing in rural areas of the parish.

Perhaps of greater concern to linking publicly supported housing residents to opportunity is simply the challenge of creating new publicly supported housing units, given the lack of land outside floodplains and wetlands.

D. Disproportionate Housing Needs

i. Compare the demographics of assisted households of publicly supported housing in the jurisdiction with the disproportionate housing needs, based on protected class identified for the jurisdiction (and region, if applicable).

According to Table 8 there are 125 units at Washington Heights. 76% of households in Washington Heights (public housing) are black. 46% of households have children.

Slidell Village North, a Project-Based Section 8 development, has 50 units. Of those households, 90% are black and 100% of the households have families. There is no information provided for Slidell Heights, which has 12 units.

Sunshine Village, a Multifamily Assisted Housing facility, has 21 units; 86% of resident households are white and 14% are black.

ii. Compare the needs of families with children in the jurisdiction (and region, if applicable) for housing units with two, and three or more bedrooms, with the available stock of assisted units.

Table 9 indicates that over 14,500 family households experience any of four housing problems - 29% of all households are experiencing problems.

According to Table 11, 14 households with children occupy Public Housing, and 36 Public Housing units have 2 bedrooms or more, indicating adequate supply of multi-bedroom units to meet current public housing residents' needs. However, public input during the AFH process revealed that the waiting list for households wishing to enter public housing is prohibitively long.

207 HCV program households have children, and 270 participating units offer 2 or more bedrooms. However, similar feedback was shared in the engagement process regarding the lack of availability of HCVs to interested households: waiting lists are too long for those in need to feel hope of accessing a voucher anytime in the near future.

8. Disability and Access

a. Describe how persons with disabilities are geographically dispersed or concentrated in the jurisdiction (and region, if applicable), including whether persons with disabilities reside in R/ECAPs and other segregated areas identified previously, and describe whether these geographic patterns vary for persons with each type of disability of persons with disabilities in different age ranges.

According to Table 13, people with disabilities represent a small share of the total population in the City. In the City hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, Self-care difficulty make up a high percent of residents then in the region. The only disability that is a higher percent in the region is Independent living.

Map 14 shows that residents with disabilities of all types are well distributed throughout the City. In the remainder of the region, people with disabilities are largely concentrated in Orleans and Jefferson Parishes.

b. Describe whether the jurisdiction (and region, if applicable) has sufficient affordable, accessible housing in a range of unit sizes, describe the areas where affordable accessible housing units are located, and identify to what extent persons with different disabilities are able to access and live in the different categories of publicly supported housing.

According to local affordable housing development and placement agencies, there is a lack of affordable, accessible housing in a range of unit sizes in Slidell and St. Tammany Parish. 21% of respondents to the AFH survey stated that “Create more ADA-accessible housing throughout the Parish in all neighborhoods” in response to the question “What do you think local government should do to address housing discrimination?” Half of the 30 survey respondents who indicated they have a disability chose this response.

c. Describe to what extent persons with disabilities in the jurisdiction (and region, if applicable) reside in segregated or integrated settings.

According to Table 15, people with disabilities in Slidell make up a greater share of residents in Other Multifamily housing (90%) than they do of the total population at the regional scale.

d. Describe the processes that exist in the jurisdiction (and region, if applicable) for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address any barriers faced in accessing government facilities, public infrastructure, transportation, proficient schools and educational programs, and jobs.

i. Government services

Government services are located in ADA-compliant facilities throughout the City.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Many of the parish’s arterial and local streets lack pedestrian infrastructure, including sidewalks, crossings and signals. Olde Towne Slidell is an exception. Commercial land uses and services are concentrated around highways owned by the state, which typically does not construct sidewalks in road projects, and especially in suburban and rural areas, which are prevalent in the City.

iii. Transportation

Public transportation is limited to a demand-response service that requires reservations to be made at least 24 hours in advance, and which limits recurring, scheduled trips and is not typically able to provide more than one round-trip per day to individuals. Urban service is unavailable on Sundays and between 6pm and 6am on other days. Rural service is unavailable on weekends, and between 5pm and 7am on weekdays. 46% of survey respondents with a disability said “Lack of

transit (accessible, affordable, walking distance)” was a “major barrier” to finding a safe and affordable home in a preferred neighborhood. Said one respondent, “There is no mass transit for a disabled person who may want to move into a better neighborhood. Many of the better neighborhoods are too far away from grocery, drug store, Wal-Mart etc.”

iv. Proficient schools and educational programs

The Census tract with the lowest school proficiency index value in the City of Slidell is 41103 (29). Census tract 41101, right outside of Slidell and between Lacombe, has the highest rate of children age 5-18 with a disability (5.9%) in the Parish, and also the lowest school proficiency index value in the Parish. In addition, 20.7% of survey respondents with a disability said schools in their neighborhood are “fair” or “poor,” compared to 18.9% of survey respondents without a disability.

v. Jobs

30% of survey respondents with a disability said good job opportunities in their neighborhood are “poor,” compared to 15.3% of survey respondents without a disability.

50% of survey respondents with a disability said “Lack of access to good jobs” are a “major barrier...to finding a safe and affordable home” in a preferred neighborhood, compared to 24.7% of survey respondents without a disability.

e. Contributing Factors of Disability and Access Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to disability and access, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Factors impacting the severity of fair housing issues related to disability and access issues include the following:

Factors	Segregation	Disparities in Access to Opportunity	Disproportionate Housing Needs
Access to transportation for persons with disabilities	X	X	X

Lack of access to opportunity due to high housing costs	X	X	X
Lack of affordable, accessible housing in range of unit sizes	X	X	X
Lack of assistance for housing accessibility modifications	X	X	X
Wetlands, land use and zoning laws	X	X	X
Occupancy codes and restrictions			X

9. Fair Housing Enforcement

a. Describe whether the program participant is currently the subject of any of the following:

- a. A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- b. A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- c. Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- d. A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- e. A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or
- f. A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

Slidell does not have any unresolved instances of items A - F above.

b. Contributing Factors of Fair Housing Enforcement

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to fair housing enforcement, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Factors impacting the severity of fair housing issues related to fair housing enforcement, outreach capacity, and resources include the following:

Factors	Segregation	Disparities in Access to Opportunity	Disproportionate Housing Needs
Lack of resources for fair housing agencies and organizations	X	X	X

VI. Fair Housing Goals and Priorities

1. For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2.
2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

The first step in identifying goals and priorities is to evaluate contributing factors to the four fair housing issues identified as critical by HUD, including racially and ethnically concentrated areas of poverty (R/ECAPs); segregation; disparity in access to opportunity; and disproportionate housing needs. St. Tammany Parish and the City of Slidell selected a set of important contributing factors and prioritized these factors with the help of dedicated stakeholders including affordable housing advocates, social service organizations, workforce development organizations, housing developers, and homeless service organizations.

Identifying and Prioritizing Contributing Factors to R/ECAP Areas

There are no R/ECAP areas in St. Tammany Parish or the City of Slidell. However, this in itself causes issues because while the Parish overall is relatively affluent, majority-white, and not very densely populated, there are populations and protected classes in genuine need that can be difficult to serve through traditional mechanisms because areas with denser concentrations of poverty receive priority for scarce affordable housing dollars. One issue mentioned by several stakeholders was **discretionary aspects of the Qualified Action Plan** that make it difficult to access resources such as LIHTC in St. Tammany Parish.

Identifying and Prioritizing Contributing Factors to Segregation

Fair Housing Issue	Contributing Factor	Prioritization and Justification
Segregation	<p>NIMBYism: There was a near-universal opinion among stakeholders that NIMBYism is active in St Tammany Parish. Residents typically move to the parish for the green space and when any development is discussed – commercial, residential or a combination – there are significant protests from those most impacted by the proposal. This is a core reason why affordable housing and integrated communities are difficult to achieve in St. Tammany Parish and the City of Slidell. In the survey, 55% (N= 22 of 40) of African American residents reported having difficulty finding safe, quality housing in a neighborhood they could afford, compared to 34% (N= 91 of 272) of all respondents.</p>	<p>High: NIMBYism causes delays for affordable housing and multi-family rental housing projects. To increase inventory of affordable, safe, and quality housing that is accessible to protected classes an ongoing campaign to educate residents is necessary.</p>
Segregation	<p>Resident Opposition to Development Based on Class and Race: Stakeholders at public meetings, stakeholder meetings, and tabling events expressed that class and race are factors in the opposition to affordable housing and is a driver of the segregation that exists in the parish. 36% of African Americans (N= 14 of 39) who took our AFH survey have experienced discrimination once or more than once when looking to rent or buy a home compared to 17% (N= 45 of 260) of all respondents. HCV holders also report discrimination when attempting to rent housing.</p>	<p>High: Fair housing education and enforcement is needed. This is particularly an issue when residents are trying to find scarce rental housing.</p>

Fair Housing Issue	Contributing Factor	Prioritization and Justification
Segregation	<p>Property Maintenance Code / Enforcement: Fair housing enforcement necessitates the ability to react when property conditions are unlivable. St. Tammany Parish has not yet adopted a property maintenance code and does not have adequate staffing to enforce any potential code. Therefore, this type of enforcement is not yet an option at the parish level.</p> <p>The City of Slidell, however, does have a property maintenance code and conduct active enforcement of violations.</p>	<p>St. Tammany - High: The Parish is in the process of adopting new practices to facilitate fair housing complaints based on property conditions that may occur. In the interim St Tammany Parish is educating STP staff, law enforcement, and tenants to call the Consumer Affairs Division of the state Attorney General’s Office and GNOFR to report and seek a remedy for violations.</p> <p>Slidell - Low: Because Slidell has a local agency dedicated to correcting landlord property condition violations that actively investigates and enforces rules, there are more resources for Slidell residents.</p>
Segregation	<p>Wetlands, Land Use and Zoning Laws: Stakeholders mentioned large-lot zoning and resistance to smaller lots or denser development as an issue in building affordable housing options. However, upon further investigation, many of these restrictions are due to restrictions on development outside central sewer systems that are mandated at the State level for environmental reasons. Slidell has 47% of its land zoned for multi-family development, and the Parish’s current code rewrite provides a number of multi-family options; the planning staff noted that most of the issues are related to community opposition to rezoning and not to the absence of appropriate zoning.</p>	<p>St. Tammany - Medium: While St. Tammany’s code allows for multi-family development, restrictions related to wetlands and lack of infrastructure can inhibit denser development. Some restrictions, such as large-lot zoning in new subdivisions outside the central sewer system, are caused by state environmental regulations outside of the Parish’s control.</p> <p>Slidell - Low: Slidell already has fairly inclusive zoning laws.</p>
Segregation	<p>Need for Public Investment in Specific Neighborhoods Including Services or Amenities: Some of the issues mentioned when working with lower-income or majority-minority communities include issues with aging housing stock and septic systems that are aging out of service and expensive to repair; prevalence of housing condition issues; lack of sidewalk infrastructure and Complete Streets (which is an issue throughout the rural parts of the Parish); and issues with vacant land and adjudicated (tax-delinquent) properties.</p>	<p>Medium: The Parish operates programs designed to address some of the public investment issues listed, including assisting residents to update aging septic systems and home rehabilitation for LMI residents. Lack of public services and infrastructure is a concern throughout the Parish and not limited to majority-minority communities or protected classes. However, because these communities are often more vulnerable when services are lacking, this is seen as a priority.</p>
Segregation	<p>Location and Type of Affordable Housing: Market-based affordable housing in the Parish and Slidell is often in poor condition and located far from services and jobs, and subsidized housing is difficult to obtain. Because there is no public transportation in the Parish, challenges for getting to jobs are amplified by the cost of needing to own a car. Increasing the amount of mixed-use and mixed-income development located near services and jobs would help remove this burden.</p>	<p>Medium: Overall, while the location of affordable housing is a concern, there are affordable housing developments that have been well-located. Broader issues such as a need to inventory the affordable housing stock and determine needs and gaps, and improve access to living-wage jobs, should assist in decreasing segregation and improving access to housing in well-located areas.</p>
Segregation	<p>Insufficient Knowledge about Fair Housing Enforcement and Resources: There are few resources in St. Tammany Parish for providing fair housing enforcement and education due to a lack of maintenance code adoption and institutional knowledge.</p>	<p>Medium: There are opportunities to partner with regional organizations such as the Greater New Orleans Fair Housing Action Center to increase knowledge and actions in the parish and Slidell related to fair housing enforcement and regulations.</p>

Identifying and Prioritizing Contributing Factors to Disparity in Access to Opportunity		
Fair Housing Issue	Contributing Factor	Prioritization and Justification
Disparity in Access to Opportunity	<p>Access to Opportunity Due to High Housing Costs: The cost of housing in St. Tammany Parish and Slidell is high. There are multiple causes for the high costs. Landlords pay increased fees for flood insurance on rental properties. Land costs are high because much of the undeveloped land is wetlands. And, there is high demand for land that is available and buildable. Based on American Community Survey 2011-2015 data, cost burden (households paying more than 30% of their income in housing costs) among renters is 45% in St. Tammany Parish and 53% in Slidell. Renter cost burden largely affects households making less than \$50,000 per year. Homeowners are also pressured by costs; in St. Tammany Parish, 19% of owners are cost-burdened, and in Slidell, 21% of owners are cost-burdened. Owner cost burden is more widespread across income categories. The engagement process revealed that people working in the parish often have to live outside the parish and commute in due to high housing costs. Low-income families tend to live in generational households because younger residents cannot afford to move into their own homes.</p>	<p>High: Housing costs are continuing to rise, according to the <i>New Orleans and Northshore Region Real Estate Market Analysis</i> conducted by the University of New Orleans in 2017; single family housing prices rose by 7% in St. Tammany Parish and 12% in Slidell between 2014 and 2016. During the same time period, average rents in the Parish rose from \$1,020 to \$1,113 and average rents in East St. Tammany (which incorporates Slidell and other areas) went from \$974 to \$1,110. Addressing the need for affordable housing, particularly affordable rental, will help ensure residents can access opportunity.</p>
Disparity in Access to Opportunity	<p>Location and Type of Affordable Housing: There are not enough affordable housing units to serve the need for housing, and much of the housing that is available is not located close to jobs (which is an issue with most housing and jobs in the parish).</p>	<p>High: More mixed-income, mixed-use development is needed to serve the needs of service-sector workers as well as ALICE residents including teachers, first responders, public-sector employees, and others who are essential to the economy of St. Tammany Parish and Slidell.</p>
Disparity in Access to Opportunity	<p>Availability of Public Transportation: St. Tammany Parish and Slidell are served only by a demand-response service (STAR Transit) that needs to be scheduled ahead of time and costs between \$3 and \$8 per round trip; vouchers are available from community organizations to pay the cost of rides. The service cannot have more than 50% of its rides be "repeat" rides that are scheduled on a regular basis (e.g. every morning or every week), making it an impractical option for commuting or school access for most households. The service is constrained by the number of vehicles available; while improved scheduling practices have increased the number of rides the service is able to provide, people who depend on the service may still not be able to receive a ride at the time it is needed (e.g. to get to a doctor's appointment).</p>	<p>High: Because housing and jobs tend not to be co-located and development is spread across the parish, households essentially must have a car in order to get to work, school, and other regular destinations. Slidell, while more compact, still has residents who report having to walk extremely long distances to work. Fixed-route public transportation, particularly along corridors that have concentrations of jobs, would be a highly significant improvement in access to opportunity for all parish and Slidell residents.</p>
Disparity in Access to Opportunity	<p>Impediments to Mobility including Need for Complete Streets: The majority of streets in the parish and in Slidell lack sidewalks, bike lanes, and other Complete Streets infrastructure, resulting in safety issues and difficult mobility for pedestrians and cyclists.</p>	<p>High: Complete Streets presents an opportunity to increase mobility for households who cannot afford a car or whose vehicle is out of service. Without a Complete Streets effort there is a public health and safety issue for those who might need to walk or bicycle. St. Tammany Parish's new land development code calls for added Complete Streets implementation, focusing interventions in areas with LMI populations and protected classes (particularly disabled individuals) and will provide significant assistance to these groups.</p>

Fair Housing Issue	Contributing Factor	Prioritization and Justification
Disparity in Access to Opportunity	<p>Access to Child Care: Childcare from private providers is costly, with \$700-800 per month being the low end of the cost scale in St. Tammany Parish and Slidell; this cost is out of reach for LMI individuals and can be a major barrier to opportunity. Once children are in school, before- and after-care availability through the school system is not consistent; each school determines whether it will provide a before- or after-care program and what the fees for the program will be. Because children are zoned to particular schools, parents cannot select a particular school that may offer childcare.</p>	<p>High: Without access to affordable childcare, LMI families' opportunity to access good jobs is limited, and their ability to pay for quality housing is constrained.</p>
Disparity in Access to Opportunity	<p>Need for Additional Middle-Skill Jobs: Economic and workforce development specialists and community college representatives are working to develop a pipeline of well-paying jobs for residents who may not yet have a college degree, but currently many of the jobs in the parish are either high-skill, high-wage jobs or service-sector jobs that pay low wages. Businesses in the service sector report extreme difficulty finding and keeping qualified workers due to the inability of workers to find housing for the wages paid; low-wage workers often live outside the parish and commute long distances to work. Growing middle-skill job opportunities would help increase wages and decrease the number of cost burdened residents.</p>	<p>High: Middle-skill job development will assist in reducing housing cost burdens. Complementing this with workforce housing and transportation options would be ideal to provide access to opportunity for all parish and Slidell residents.</p>
Disparity in Access to Opportunity	<p>Wetlands, Land Use and Zoning Laws: Ensuring that land use and zoning laws allow for mixed-use development and multi-family development will facilitate development of affordable housing options and access to opportunity.</p>	<p>Medium: St. Tammany's zoning code allows for planned-unit developments and the Parish has encouraged innovative mixed-use developments, as well as providing re-zoning to co-locate services such as the new Safe Haven campus for behavioral health services. Slidell's zoning also incorporates areas for commercial development along corridors that serve most neighborhoods well. However, in at least one case in the parish, a discretionary development moratorium was issued which resulted in the loss of one million dollars in grant money to create an affordable development. Ensuring that affordable and mixed-income development near jobs is facilitated and encouraged by the development code should be a clear priority.</p>
Disparity in Access to Opportunity	<p>Location of Employers and Services: Employment is widely distributed throughout the Parish, which can create challenges for accessing employment for residents who have unreliable transportation or have more than one person in a household that needs to access different destinations during the day. The same issue applies to public and community services; while some are co-located, others are distributed throughout the parish and the City of Slidell, meaning that (for example) job seekers need to go different places for workforce training, Hi Set testing, and disability accommodations.</p>	<p>Medium: Location of employers, while it can be problematic, is a challenge for everyone in the parish and is difficult to alter given employers' needs for different types of facilities and the fact that wetlands will impact future development. The Parish is taking steps to co-locate community services such as behavioral health services and workforce services near affordable and supportive housing in order to accommodate the needs of different populations. Co-location of services should remain a priority for the City of Slidell and the Parish.</p>

Fair Housing Issue	Contributing Factor	Prioritization and Justification
Disparity in Access to Opportunity	<p>Access to Health Care, Especially Mental Health Services: Mental and behavioral health was mentioned by many stakeholders as an area where the Parish and Slidell are under-resourced after the closure of Southeast Hospital in 2012; many homeless individuals have mental health challenges that prevent them from accessing housing and jobs, and workforce development professionals also report difficulty finding resources for job seekers or community college students who have mental health challenges.</p>	<p>High: After the closure of Southeast Hospital, the Parish worked to design the proposed Safe Haven campus, which will provide access to support for individuals with an addiction or behavioral health issue; a drop-in center for people with mental health needs; supportive housing; and a day center for homeless individuals. Among other services, Safe Haven is currently in the process of securing funding for a 24/7 service center. The day drop-in center will be opening in Spring of 2018. Providing transportation options for residents from throughout the parish and from Slidell to access these resources will be important to ensure they have maximum impact.</p>
Disparity in Access to Opportunity	<p>Location of Proficient Schools: No school in Slidell or in St. Tammany Parish received less than a "C" grade from the Louisiana Department of Education in 2017, making both jurisdictions superior to the region in access to quality public education. However, black, non-Hispanic residents tend to be concentrated in areas with comparatively lower-performing schools in both St. Tammany Parish and the City of Slidell.</p>	<p>Medium: School quality can be enhanced by ensuring strong STEM education, and access to high-wage career paths through education on subjects like coding. Standardizing the availability of before- and after-care would serve as a wrap-around service that would benefit students whose parents work longer hours or do not have flexibility to pick them up. These before- and after-school care services can be combined with homework and tutoring assistance to raise performance levels.</p>
Disparity in Access to Opportunity	<p>Access to Financial Services: Overall, it appears from survey results and interviews that access to financial services is less of a concern for St. Tammany Parish and Slidell residents; while some applicants report being denied credit, most report that the major issues in accessing housing were the high cost of purchasing or renting a home/apartment and the difficulty of gathering enough funds for a down payment or security deposit. Stakeholders did note that there are opportunities to promote additional Community Revitalization Act (CRA) investments from banks to encourage homebuying for LMI residents.</p>	<p>Low: Homeownership education and credit counseling services are available from several non-profit organizations and should continue to be promoted by the Parish and Slidell. The Parish and Slidell should also work with banks to promote CRA investment. Generally, it appears that residents largely have access to financial services.</p>

Identifying and Prioritizing Contributing Factors to Disproportionate Housing Needs		
Fair Housing Issue	Contributing Factor	Prioritization and Justification
Disproportionate Housing Needs	<p>NIMBYism: Impacted residents protest ALL development in the parish, especially developments that would lead to denser communities. This makes development of affordable units difficult and costly. One fully-funded proposed development of affordable homeownership units with a HOME allocation was blocked by a moratorium because the parish council received a petition with 700 signatures opposed to additional homes being added to their subdivision.</p>	<p>High: Providing education for the community and public officials about the need for affordable and mixed-income development, its impact on the local economy, and the many households that need affordable options including first responders, teachers, LLPNs, and service-sector workers should be a priority.</p>

Fair Housing Issue	Contributing Factor	Prioritization and Justification
Disproportionate Housing Needs	<p>Resources for Affordable Housing Development: Resources for affordable development are difficult to secure in St. Tammany Parish for several reasons. One is the prevalence of floodplains and wetlands in the area, which constrains the availability of HUD funding. Another is the overall prevalence of affluent households, which decreases the Parish's competitiveness for LIHTC funds based on the State's Qualified Action Plan.</p>	<p>High: Funding affordable housing development to meet the needs of low-income and ALICE (Asset-Limited, Income-Constrained, Employed) households in the parish and in Slidell has been a focus of the Parish and City of Slidell in their Consolidated and Annual Action Plans. An initial inventory of the affordable inventory will help determine what additional resources are needed and how to advocate within the Qualified Action Plan criteria.</p>
Disproportionate Housing Needs	<p>Maintenance Challenges for Aging Housing: The overall availability of publicly supported housing in the Parish and the City of Slidell is low, meaning that many lower-income and cost-burdened households live in aging and other less-desirable developments that have issues with housing conditions. The AFFH data shows that 14% of housing in St. Tammany Parish has one of four housing conditions and 18% in Slidell has one of four housing conditions (incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, or cost burden greater than 30%).</p>	<p>High: Programs like the Parish program to address homeowners who cannot afford to replace aging septic systems and have received environmental citations are useful to prevent displacement and address some of these challenges. The program is oversubscribed and needs additional funding to insure LMI residents with aging sewer distribution systems receive assistance to repair or replace their system. Additionally, non-profits throughout the parish work on housing rehab, but funding is limited compared to the need.</p>
Disproportionate Housing Needs	<p>Prevalence of Single-Family Ownership Housing: St. Tammany Parish has 75% ownership housing and Slidell has 71% ownership housing. In our AFH survey, those searching for rental housing were more likely to report a range of problems including the ability to find safe, quality housing in a neighborhood they could afford. Renters are more likely to be low-income, and black residents are more likely to be renters than white residents.</p>	<p>Medium: Providing additional rental inventory of all types that is mixed-income and affordable can help alleviate some of the cost burdens among renters. In order to do this, some of the above challenges such as securing additional resources and overcoming NIMBYISM will need to be addressed.</p>
Disproportionate Housing Needs	<p>Access to Publicly-Supported Housing for Persons with Disabilities: The availability of accessible, ADA-compliant housing for persons with disabilities is limited throughout the parish and Slidell. And, more housing is needed to address the needs of residents with developmental disabilities.</p>	<p>Medium: The Safe Haven campus will start to address the needs of those with behavioral health disabilities with an upcoming supportive housing development. New codes also require ADA compliance, but retrofits for existing buildings may need to be considered to provide adequate inventory.</p>
Disproportionate Housing Needs	<p>Floodplains and Wetlands: Floodplains and wetlands increase the costs of development and make it more difficult to provide reasonably-priced housing. The fact that much of the new development is greenfield development also drives up prices due to the presence of wetlands and need for mitigation and infrastructure development. It is also far more difficult to utilize and compete for housing funds when large areas are located in the floodplain.</p>	<p>Medium: While the Parish and Slidell cannot change the overall situation, there are opportunities to work with developers to come up with new incentives and financing mechanisms to promote workforce and affordable housing development.</p>
Disproportionate Housing Needs	<p>Property Maintenance Code: St. Tammany Parish lacks a property maintenance code and therefore cannot inspect properties outside of initial construction or substantial renovation. This affects renters who are living in substandard properties and have no means of working with the Parish to enforce quality standards. The City of Slidell does have and does enforce a property maintenance code for rental and ownership properties and does enforce their code.</p>	<p>St. Tammany Parish - High: St. Tammany Parish will provide a mechanism for residents to submit complaints to appropriate entities and ensure that tenants are able to live in safe, decent housing.</p> <p>Slidell - N/A: Slidell has a property maintenance code and enforces it, so this priority is not applicable.</p>

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

GOAL	STRATEGY	CONTRIBUTING FACTORS	RESPONSIBLE ACTORS	TIMEFRAME FOR ACTION: St. Tammany Parish	MEASURE OF ACHIEVEMENT: St. Tammany Parish	TIMEFRAME FOR ACTION: Slidell	MEASURE OF ACHIEVEMENT: Slidell
Continue to expand affordable housing options in high opportunity areas.	Utilize public land and more adjudicated properties as an in-kind subsidy for affordable development in areas with strong access to jobs and services.	Resources for Aff. Hsg.; Location & Type of Aff. Hsg.	STP; Slidell where possible due to floodplain and wetlands constraints	Immediate-3 years	Actively seek out nonprofits that need land to build affordable housing. Continue to educate nonprofits to ask for + be awarded adjudicated land by STPG. Land on Civic Source may come with reduced non-auction price.	Immediate	# of lots adjudicated to City and then transferred to a non-profit
	Offer an expedited permitting process, reduced parking requirements and density or height bonuses for multi-family development that incorporates a percentage of aff. housing units.	NIMBYISM; Wetlands, Land Use, and Zoning Laws	STP; Slidell	2-5 years	Planning and Development representatives will work with public to offer expedited permits for multifamily development that incorporates a percentage of affordable housing units.	Immediate	Review and approval should take less than 180 days
	Develop an incentive program that provides infrastructure funding for development in return for a required percentage of affordable housing development.	Resources for Aff. Hsg.	STP	3 years	Invite LHC staff to meet with officials in the parish to educate them on examples of incentive programs that might work for STP to increase the number of affordable housing units	N/A	N/A
	Maximize use of rural development grants for affordable housing, given that St. Tammany Parish may no longer qualify as rural in the near future.	Resources for Aff. Hsg.; Lack of Public Investments	STP	Immediate	Inform all nonprofits, local, regional and state agencies that STP may lose rural designation so they should seek and apply for rural grants NOW.	N/A for Slidell	N/A for Slidell
	Increase availability of Low-Income Housing Tax Credit (LIHTC) funds within the Parish by advocating for collaboration with or proximity to drivers of opportunity, including but not limited to low-poverty census tracts or high-performing schools as eligible criteria in the state's QAP.	Resources for Aff. Hsg.	STP; Slidell	5 years	STP representative will work with developers to bring LIHTC funds into STP.	5 years	LIHTC funds investment in community
	Quantify the current affordable housing inventory, including bedroom mix, income requirements, and expiration of affordability terms.	NIMBYISM; Location & Type of Aff. Hsg.	STP; Slidell	2 years	Develop electronic database of all properties, type and bedroom size, income requirements	6 months	Clip book with all properties, type and bedroom size, income requirements

GOAL	STRATEGY	CONTRIBUTING FACTORS	RESPONSIBLE ACTORS	TIMEFRAME FOR ACTION: St. Tammany Parish	MEASURE OF ACHIEVEMENT: St. Tammany Parish	TIMEFRAME FOR ACTION: Slidell	MEASURE OF ACHIEVEMENT: Slidell
<p>Continue to expand affordable housing options in high opportunity areas (cont.)</p>	<p>Set a goal to increase affordable housing availability in St. Tammany Parish and Slidell by 10% over the next 10 years.</p>	<p>Location and Type of Aff. Hsg.; Lack of Access to Opportunity due to High Housing Costs</p>	<p>STP; Slidell</p>	<p>10% in 10 years</p>	<p>Rents evaluated on HUD limits. Goal of 10% established based on realistic evaluation of programs available with revenue streams that would make developments possible.</p>	<p>10% in Slidell over next 10 years— Slidell has very little available land left except FTC</p>	<p>Rents to be evaluated based on HUD income limits</p>
	<p>Prioritize permanently affordable and long-term affordable housing (affordability terms greater than 50 years) to maximize the value of public investment.</p>	<p>Lack of Access to Opportunity due to High Housing Costs</p>	<p>STP; Slidell</p>	<p>1 year – indefinite (depends on how CDBG funds are used)</p>	<p>Prioritize permanently affordable homeownership and/or 50+ year affordable rental in any CDBG RFP scoring dedicated to subsidizing affordable housing</p>	<p>1 year – indefinite (depends on how CDBG funds are used)</p>	<p>Prioritize perm. affordable homeownership and/or 50+ year affordable rental in CDBG RFP scoring.</p>
<p>Continue to support access to homeownership by providing affordable homeownership options and supporting credit counseling and homeownership education.</p>	<p>Continue to work with partners including banks and non-profits to ensure that credit counseling and homeownership education is available and accessible to all low-income families with a desire to purchase a home. Advertise available programs at Parish and Slidell events and through the Parish and Slidell websites.</p>	<p>Access to Financial Services; Lack of Access to Opportunity due to High Housing Costs; Prevalence of Single-Family Ownership Housing</p>	<p>STP; Slidell</p>	<p>6 months</p>	<p>Host 1 homeownership event in East STP with representatives of banks, nonprofits, credit unions, agencies like USDA etc to assist low income families learn how they can buy a home</p>	<p>2 years</p>	<p>Use CDBG funds to establish a homeownership education program</p>
<p>Provide additional temporary and permanent shelter for homeless residents of St. Tammany Parish.</p>	<p>Provide additional shelter beds and PSH housing units to serve all homeless residents of St. Tammany Parish.</p>	<p>Location and Type of Affordable Housing</p>	<p>STP; Slidell</p>	<p>10 years</p>	<p>Renovate Cardinal Cove as a homeless shelter for men and women in the 22nd judicial specialty court program; assist homeless families by supporting the creation of a DAY Program Facility (for Family Promise) at Safe Haven that will also act as overnight accommodations in an emergency; assist veterans in purchasing Danielle Inn by supplying information on fundraising and grant research</p>	<p>5 years</p>	<p>Work with Northshore Homeless Coalition and STP and COS to identify funding and provide additional shelter beds and PSH</p>

GOAL	STRATEGY	CONTRIBUTING FACTORS	RESPONSIBLE ACTORS	TIMEFRAME FOR ACTION: St. Tammany Parish	MEASURE OF ACHIEVEMENT: St. Tammany Parish	TIMEFRAME FOR ACTION: Slidell	MEASURE OF ACHIEVEMENT: Slidell
Provide additional temporary and permanent shelter for homeless residents of St. Tammany Parish (cont.).	Identify a funding source and assist in identifying a service provider to apply for these funds to secure temporary housing for residents who have lost their rental housing due to housing condition issues, housing discrimination, domestic violence, or temporary interruption in income.	Location and Type of Affordable Housing; Lack of Opportunity due to High Housing Costs	STP; Slidell	See above	See above	2 years	Work with Northshore Homeless Coalition, STP and COS to identify a funding source for emergency housing needs
Improve alternative transportation options for residents of St. Tammany Parish and Slidell.	Examine how the Parish's new Complete Streets policy interacts with existing and planned housing development and ensure maximum opportunities for sidewalks and bike lanes near publicly supported housing development.	Impediments to Mobility including Lack of Complete Streets	STP; Slidell	3 years	STP planning and development will create a masterplan using STP staff and feedback from residents	3 years	Slidell has adopted a Gause Blvd sidewalk Masterplan in accordance with DOTD policy and will utilize RPC funding to create a more walkable corridor
	Secure a local dedicated revenue source to match federal funds in supporting STAR Transit to expand demand-response transportation capacity in both urban and rural areas.	Availability of Public Transportation	STP; Slidell	10 years	Secure assistance of RPC, STEDF, GNOF, NSF, federal and state legislators to find revenue for a match	10 years	Work with STP to find additional funds for transportation needs of the community
	Support the establishment of fixed-route public transit in areas with concentrations of housing and job availability.	Availability of Public Transportation	STP; Slidell	10 years	Secure assistance of RPC, STEDF, GNOF, NSF, federal and state legislators to find the will and the revenue	10 years	Work with STP to find additional funds for fixed route transit
	Pursue funding every year under the state's Safe Routes to Public Places program to improve sidewalk and bicycle infrastructure near schools in areas where fewer families have access to private vehicles, and areas with concentrations of ALICE families or high percentages of reduced and free lunch among children.	Impediments to Mobility including Lack of Complete Streets	STP; Slidell	5 years	Locate concentrations of ALICE families and apply for SAFE Routes grants to increase sidewalk and bicycle routes. Apply Annually.	5 years	Locate concentration of ALICE families and apply for SAFE ROUTES Grants to increase sidewalk and bicycle routes

GOAL	STRATEGY	CONTRIBUTING FACTORS	RESPONSIBLE ACTORS	TIMEFRAME FOR ACTION: St. Tammany Parish	MEASURE OF ACHIEVEMENT: St. Tammany Parish	TIMEFRAME FOR ACTION: Slidell	MEASURE OF ACHIEVEMENT: Slidell
<p>Improve alternative transportation options for residents of St. Tammany Parish and Slidell (cont.).</p>	<p>Support the establishment of public transit to and from Downtown New Orleans to facilitate access to well-paying jobs.</p>	<p>Availability of Public Transportation; Location of Employers & Services</p>	<p>STP; Slidell</p>	<p>5 years</p>	<p>Secure assistance of RTA, RPC, STEDF, GNOF, NSF, federal and state legislators to initiate revenue search for this additional service.</p>	<p>5 years</p>	<p>Work with RTA to provide transit</p>
	<p>Publicize Green Ride service, employer-provided transportation options, and other alternative transportation services.</p>	<p>Availability of Public Transportation; Location of Employers</p>	<p>STP; Slidell</p>	<p>1 year</p>	<p>Contact GreenRide and understand how it works. Develop one carpooling plan for one area and evaluate its success.</p>	<p>10 years</p>	<p>Work with STP, COS and RPC to create additional carpool sharing hubs</p>
	<p>Encourage mixed-use development adjacent to the Tammany Trace and future trail systems to allow for bicycle and pedestrian trail transportation.</p>	<p>Location of Employers & Services</p>	<p>STP; Slidell</p>	<p>8 years</p>	<p>Find a developer interested in this idea and support them in finding property close to the Trace to create a mixed use development</p>	<p>5 years</p>	<p>Additional housing units along Highway 190 and Highway 11 Corridor</p>
<p>Use education to reduce NIMBYism in St. Tammany Parish and Slidell.</p>	<p>Partner with GNOFHAC to expand fair housing outreach, education, and training for realtors and landlords to ensure their understanding of fair housing requirements.</p>	<p>Lack of Fair Housing Enforcement</p>	<p>STP; Slidell</p>	<p>1 year</p>	<p>STPG and COS will conduct joint training for realtors, landlords, financial institutions, etc once each year</p>	<p>6 months</p>	<p># of individuals educated in joint City/STP trainings</p>
	<p>Encourage private landlords to participate in the Housing Choice Voucher program by providing information about the program during permitting procedures and take advantage of exception payment standards in high-opportunity zip codes.</p>	<p>Adding responsibilities to the permitting office; NIMBYISM</p>	<p>STP; Slidell</p>	<p>1 year</p>	<p>Add this topic to joint training with COS and STPG (see above – 1 space)</p>	<p>1 year</p>	<p>Work with SHA to have a brochure available for homebuilders</p>
	<p>Educate landlords about required standards of quality in their rental properties and warn them about potential violations of fair housing rules.</p>	<p>Lack of Fair Housing Enforcement</p>	<p>STP; Slidell</p>	<p>1 year</p>	<p>Find / create STP landlord list</p>	<p>1 year</p>	<p># of landlords trained in quality standards and violation of rules</p>

GOAL	STRATEGY	CONTRIBUTING FACTORS	RESPONSIBLE ACTORS	TIMEFRAME FOR ACTION: St. Tammany Parish	MEASURE OF ACHIEVEMENT: St. Tammany Parish	TIMEFRAME FOR ACTION: Slidell	MEASURE OF ACHIEVEMENT: Slidell
<p>Use education to reduce NIMBYism in St. Tammany Parish and Slidell. (cont.)</p>	<p>Partner with GNOFHAC to expand fair housing outreach, education, and training for officials to ensure enforcement of local obligations to uphold fair housing rules and appropriate allocation of resulting resources available to assist families.</p>	<p>Insufficient Knowledge of Fair Housing Enforcement & Resources; NIMBYISM; Wetlands, Land Use & Zoning Laws</p>	<p>STP; Slidell</p>	<p>1 year</p>	<p>Identify what information needs to be communicated then STPG and COS jointly ; invite LHC dignitaries to educate the administration and elected officials</p>	<p>1 year</p>	<p># of COS and STP elected officials trained</p>
	<p>Maintain a visual flipbook of recent and proposed affordable housing developments to confront stereotypes that affordable housing is low in quality or appears different from other housing.</p>	<p>NIMBYISM; Resident Opposition to Development Based on Class and Race</p>	<p>STP; Slidell</p>	<p>1 year</p>	<p>Create electronic montage of affordable housing properties and send to all St Tammany Parish town, parish, state, and federal officials with descriptions of home owners/residents; send to all nonprofits and present at civic and other pertinent gatherings</p>	<p>6 months</p>	<p>Work with Northshore Homeless Coalition,STP and COS to compile flipbook</p>
<p>Create a cadre of trained professionals in multiple organizations as fair housing referral sources.</p>	<p>Work with the Greater New Orleans Fair Housing Action Center to schedule testers in St. Tammany Parish and Slidell to gauge the incidence of discrimination. Minority residents of the Parish report numerous discriminatory practices.</p>	<p>Lack of Fair Housing Enforcement</p>	<p>STP; Slidell</p>	<p>1 year</p>	<p>Gather data to see what discrimination is in STP and present data to administration</p>	<p>1 year</p>	<p>Gather data to see what discrimination is in Slidell</p>
	<p>Encourage multiple service providers to refer residents to appropriate fair housing resources.</p>	<p>Insufficient Knowledge of Fair Housing Enforcement and Resources</p>	<p>STP; Slidell</p>	<p>Immediate</p>	<p>Present information to call receivers in STPG offices to refer anyone perceiving discrimination in housing be referred to the Greater NO Fair Housing Action Center, SE LA Legal Service and Consumer Affairs Division of the LA Attorney General's Office</p>	<p>Immediate</p>	<p>Track the number of complaints that are reported and/or founded/unfounded</p>

GOAL	STRATEGY	CONTRIBUTING FACTORS	RESPONSIBLE ACTORS	TIMEFRAME FOR ACTION: St. Tammany Parish	MEASURE OF ACHIEVEMENT: St. Tammany Parish	TIMEFRAME FOR ACTION: Slidell	MEASURE OF ACHIEVEMENT: Slidell
<p>Continue efforts to ensure that renters and homeowners have access to healthy housing without the presence of housing quality problems.</p>	<p>Because St. Tammany Parish currently lacks a Property Maintenance Code, ensure that calls from renters about housing quality problems are referred to the Attorney General’s Consumer Protection division and / or the Greater New Orleans Fair Housing Action Center, SE LA Legal Services</p>	<p>Property Maintenance Code Enforcement</p>	<p>STP; Slidell</p>	<p>Immediate</p>	<p>Present information to call receivers in STPG offices so that they can refer renters to LA Attorney General’s Consumer Affairs office and/or the Greater NO Fair Housing Action Center when they believe that substandard housing or discrimination is present collect data on number of calls received</p>	<p>3 months</p>	<p>COS and STP develop a close relationship with AG’s Consumer Protection and GNOFHAC to identify and address discrimination complaints-Track number of referrals to each agency</p>
	<p>Adopt a Property Maintenance Code with strict anti-retaliation provisions for St. Tammany Parish and allocate operating funds to conduct inspections of rental properties at tenants’ request in the next 10 years, given current resource constraints that reduce the ability to add inspectors.</p>	<p>Property Maintenance Code Enforcement</p>	<p>STP; Slidell</p>	<p>10 years</p>	<p>Collect from STPG Inspections and Enforcement the numbers of calls they receive from renters; Educate the STPG Administration and Officials with the number of cases referred for fair housing; STPG adopts a Property Maintenance Code and hires appropriate staff for inspections and follow up</p>	<p>10 years</p>	<p>Work with STP to adopt the International Property Maintenance Code</p>
	<p>Continue to actively enforce Slidell’s Property Maintenance Code and respond to calls from renters about housing quality issues that their landlords refuse to correct in the City of Slidell.</p>	<p>Fair Housing Enforcement</p>	<p>Slidell</p>	<p>N/A</p>	<p>N/A</p>	<p>Immediately</p>	<p>Tracking of the number and location of housing</p>
	<p>Continue to grow the St. Tammany Parish DHHS program that upgrades aging septic systems to help owners who receive environmental fines and cannot afford to repair their systems.</p>	<p>Deferred Maintenance Challenges for Aging Housing</p>	<p>STP; Slidell</p>	<p>Immediate</p>	<p>Administration adds funding to this program in 2018</p>	<p>10 years</p>	<p>COS and STP work together to connect sewer/water where available and share the cost for system upgrades</p>

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Continue efforts to ensure that renters and homeowners have access to healthy housing without the presence of housing quality problems. (cont.).	Study the number of substandard occupied structures in the parish and Slidell and work with non-profit partners to make a Home Repair Plan for the parish that provides a dedicated home repair program for all areas of the parish.	Deferred Maintenance Challenges for Aging Housing	STP; Slidell	5 years	Collect pictures, locations of substandard property; locate owners; write letters to get houses up to standard; for LMI owners give them application for any Home Repair program funding	5 years	Conduct needs assessment for aging housing in COS and STP
Improve access to before- and after-school care programs for the growing number of families with non-traditional work hours and limited flexibility.	Create access to Community Education and after-school care programs, at their own school or a neighboring school, for families who can demonstrate practical need based on work hours.	Access to Child Care	STP; Slidell	2 years	Identify and map schools that do and do not conduct 1) after school programs and 2) early drop off programs; collect and map information on costs of each	5 years	# of children afforded after school program- Work with STSB to provide after school programs in neighboring schools.
	Seek financial aid for Community Education and after-school care programs for families who can demonstrate financial need.	Access to Child Care	STP; Slidell	2 years	Connect with the WDB One Stop Center to investigate their resources; research grant opportunities for this funding; if a grant is identified submit application	5 years	# of children afforded after school program- Work with STSB to provide after school programs
	Promote STEM education opportunities starting in elementary school.	Location of Proficient Schools	STP; Slidell	1 year	Meet with STPSB Curriculum Manager to discuss if coding and related technical units are included; if not ask for consideration to include these units	5 years	
	Provide cultural competency training for instructors and administrators to increase knowledge of barriers their students and families may face.	Location of Proficient Schools	STP; Slidell	2 years	Work with Janelle Stein, Behavioral Health Director, to educate 70 providers in the STP schools to these barriers if they are unaware.	5 years	# of trained instructors/admin staff -COS, STP and STSB
Communicate with Economic Development Leaders the need for additional well paying, middle skill jobs for STP and Slidell residents.	Work with educational institutions and the State of Louisiana to attract middle-skill employers and develop tailored workforce training programs that increase access to well-paying jobs for those without a college degree.	Lack of Middle-Skill Jobs	STP; Slidell	6 months - 2 years	Meet with STEDF and WDB to review and encourage - expand - their efforts and plans to attract middle skill employers to the parish	5 years	# of middle skilled jobs created- Work with STP, COS, EDF and WIC to co-locate and develop tailored programs for specific employers in the local area

GOAL	STRATEGY	CONTRIBUTING FACTORS	RESPONSIBLE ACTORS	TIMEFRAME FOR ACTION: St. Tammany Parish	MEASURE OF ACHIEVEMENT: St. Tammany Parish	TIMEFRAME FOR ACTION: Slidell	MEASURE OF ACHIEVEMENT: Slidell
<p>Co-locate social services and affordable housing to assist residents in accessing health care, education, employment, and other essential services.</p>	<p>Co-locate behavioral health and related services in St. Tammany region in Slidell (East) and Safe Haven (west). According to the Safe Haven Campus Master Plan, ensure a centralized area for receiving high-quality behavioral and mental health treatment.</p>	<p>Access to Health Care</p>	<p>STP</p>	<p>1 year</p>	<p>Get up to 6 nonprofit and state agencies providing social services to co-locate in the Slidell area Develop a list with the Executive Committee of Safe Haven of what nonprofit and social service agencies should be collocated on the Safe Haven Campus</p>	<p>N/A</p>	<p>N/A</p>
	<p>Provide shelter at Safe Haven for individuals with behavioral health concerns</p>	<p>Need for Additional Publicly-Supported Housing for Residents with Disabilities</p>	<p>STP</p>	<p>5 years</p>	<p>Renovate Cardinal Cove</p>	<p>N/A</p>	<p>N/A</p>
	<p>Use public land and locate funding to establish affordable and student housing options with easy walkability to public assets and job opportunity. Areas may include areas near central Slidell, central Covington, and near the new NTCC campus on Highway 434.</p>	<p>Lack of Access to Opportunity due to High Housing Costs</p>	<p>STP</p>	<p>5 years</p>	<p>Create a collation to identify a developer interested in building student housing within walking distance to NTCC on Hwy 434</p>	<p>N/A</p>	<p>N/A</p>
<p>Review land use regulations for opportunities to encourage affordable housing development</p>	<p>Strongly discourage the use of development moratoriums that affect affordable housing projects in the zoning and permitting process; educate officials about the potential fair housing implications of such moratoriums.</p>	<p>NIMBYISM; Wetlands, Land Use and Zoning Laws</p>	<p>STP; Slidell</p>	<p>3 years</p>	<p>Have legal counsel educate officials regarding moratoriums as they relate to fair and affordable housing</p>	<p>1 year</p>	<p># of elected officials trained; review zoning laws and educate elected officials on the implications of fair housing discrimination</p>

GOAL	STRATEGY	CONTRIBUTING FACTORS	RESPONSIBLE ACTORS	TIMEFRAME FOR ACTION: St. Tammany Parish	MEASURE OF ACHIEVEMENT: St. Tammany Parish	TIMEFRAME FOR ACTION: Slidell	MEASURE OF ACHIEVEMENT: Slidell
<p>Review land use regulations for opportunities to encourage affordable housing development (cont.).</p>	<p>Continue to support the use of Planned- Unit Development overlays to enable efficient use of property that contains wetlands in an attempt to reduce ongoing housing price increases that may be caused by land costs for large properties with high percentages of wetlands.</p>	<p>Prevalence of Floodplains and Wetlands; Land Use and Zoning Laws</p>	<p>STP; Slidell</p>	<p>3 years</p>	<p>Seek opportunities with housing developers to utilize PUDs to make a project more feasible.</p>	<p>Immediate</p>	<p>COS supports BZA variances to adjust for wetland avoidance and increase density</p>
	<p>Work with developers to connect development sites to central sewer services, where feasible.</p>	<p>Wetlands, Land Use and Zoning Laws; Constrained Resources for Aff. Hsg.</p>	<p>STP; Slidell</p>	<p>2 years</p>	<p>Identify and map all central sewer systems in the parish.</p>	<p>Immediate City Ordinance Requires connection to City services</p>	<p>Number of new single family and multi-family housing units added to community</p>
<p>Continue efforts to mitigate and prevent environmental issues that disproportionately affect low-income and minority residents of St. Tammany Parish and Slidell.</p>	<p>Prioritize investments in flood mitigation areas that have high percentages of low-income and ALICE residents.</p>	<p>Prevalence of Floodplains and Wetlands</p>	<p>Slidell</p>		<p>Establish an elevation program with COS to elevate homes in low-income areas</p>	<p>1 year</p>	<p># of Housing units elevated in low-income areas</p>
	<p>Avoid locating sources of pollution or environmental hazard such as refineries, polluting factories, large highways, or landfills adjacent to low-income and minority communities.</p>	<p>Location and Type of Affordable Housing</p>	<p>STP; Slidell</p>	<p>2 years</p>	<p>Legal counsel will educate planning and zoning commissions on environmental hazards related to housing</p>	<p>Immediate</p>	<p>Minimize the number of conditional use permits issued. Any uses that create environmental pollution/noise hazard must meet an intense conditional use process</p>

Assessment of Fair Housing

St. Tammany Parish & City of Slidell

I. Cover Sheet

1. Submission date: January 4, 2018
2. Submitter name: St. Tammany Parish Government
3. Type of submission (e.g. single program participant, joint submission): Joint Submission
4. Type of program participant(s) (e.g. consolidated plan participants, PHA): Consolidated Plan Participants
5. For PHAs, Jurisdiction in which the program participant is located: NA
6. Submitter members (If applicable): NA
7. Sole or lead submitter contact information:
 - a. Name: Patricia P. Brister
 - b. Title: Parish President
 - c. Department: St. Tammany Parish Government
 - d. Street address: P.O. Box 628
 - e. City: Covington
 - f. State: LA
 - g. Zip code: 70434
8. Period covered by this assessment: 2018 - 2022
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R §§5.150-5.180 or comparable replacements regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.425(a)(1), 570.487(b)(1), 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certifications, except that some of the analysis, goals or priorities included in the AFH may only apply to the an individual program participant as expressly states in the AFH.

Note: Signature pages are included as separate attachments to the document.

Patricia P. Brister (Signature) 1/4/18 (Date)

Tara Hurt (Signature) 1/4/18 (Date)

12. Departmental acceptance or non-acceptance:

Patricia P. Brister (Signature) 1/4/18 (Date)