

NSP Substantial Amendment

City of Jacksonville, Florida (Duval County)

August, 2010 (v12)

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Application for Federal Assistance (SF-424 Forms)

APPLICATION FOR FEDERAL ASSISTANCE		OMB Approved No. 3076-0006		Version 7/03	
1. TYPE OF SUBMISSION: Application		2. DATE SUBMITTED 12/1/2008		Applicant Identifier	
<input type="checkbox"/> Construction		3. DATE RECEIVED BY STATE		State Application Identifier	
<input checked="" type="checkbox"/> Non-Construction		4. DATE RECEIVED BY FEDERAL AGENCY		Federal Identifier	
5. APPLICANT INFORMATION					
Legal Name:		Organizational Unit:			
City of Jacksonville		Department:			
Organizational DUNS: 004076998		Division: Office of the Director			
Address:		Name and telephone number of person to be contacted on matters involving this application (give area code)			
Street: 214 N. Hogan Street, Suite 800		Prefix: Mrs		First Name: Wight	
City: Jacksonville		Middle Name			
County: Duval		Last Name Greger			
State: Florida		Zip Code 32202		Suffix:	
Country: USA		Email: wgreger@coj.net			
6. EMPLOYER IDENTIFICATION NUMBER (EIN):		Phone Number (give area code)		Fax Number (give area code)	
59-6000344		(904) 255-8204		(904) 357-5907	
8. TYPE OF APPLICATION:		7. TYPE OF APPLICANT: (See back of form for Application Types)			
<input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		B - County (Urban)			
If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.)		Other (specify)			
Other (specify)		9. NAME OF FEDERAL AGENCY: U S Department of Housing and Urban Development			
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER:		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:			
TITLE (Name of Program): Neighborhood Stabilization Program		1) Establish financing mechanisms 2) Purchase and rehabilitate abandoned or foreclosed properties 3) Establish land banks 4) Demolish blighted structures 5) Redevelop demolished or vacant properties			
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): Duval		14. CONGRESSIONAL DISTRICTS OF:			
13. PROPOSED PROJECT		a. Applicant Congressional District 3			
Start Date: 12/1/2008		b. Project Congressional District 3			
Ending Date: 12/1/2013		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?			
15. ESTIMATED FUNDING:		a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON			
a. Federal \$ 26,625,317.00		DATE:			
b. Applicant \$.00		b. No. <input checked="" type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372			
c. State \$.00		<input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW			
d. Local \$.00		17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?			
e. Other \$ 40,000,000.00		<input type="checkbox"/> Yes If "Yes" attach an explanation. <input checked="" type="checkbox"/> No			
f. Program Income \$.00		18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.			
g. TOTAL \$.00		a. Authorized Representative			
Prefix Mr.		First Name John		Middle Name	
Last Name Peyton				Suffix	
b. Title Mayor		c. Telephone Number (give area code)		(904) 630-1776	
d. Signature of Authorized Representative		e. Date Signed			

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Kerri Stewart
Deputy Chief Administrative Officer
For: Mayor John Peyton
Under Authority of:
Executive Order No. 07-12

Standard Form 424 (Rev.9-2003)
Prescribed by OMB Circular A-102



CITY OF JACKSONVILLE DUVAL COUNTY THE NSP SUBSTANTIAL AMENDMENT

<p>Jurisdiction(s): <u>City of Jacksonville</u> <i>(identify lead entity in case of joint agreements)</i></p> <p>Jurisdiction Web Address:</p> <ul style="list-style-type: none">• www.coj.net/Departments/Housing+and+Neighborhoods/default.htm	<p>NSP Contact Person:</p> <p>Wight Greger Director Housing & Neighborhoods 214 N. Hogan Street, 8th Floor Jacksonville, FL 32202 Telephone(904) 255-8204 Fax: (904) 255-8285 Email: wgreger@coj.net</p>
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A. Areas of Greatest Need

The City of Jacksonville/Duval County developed a list of target areas for the Neighborhood Stabilization Program pursuant to the Housing and Economic Recovery Act of 2008 as outlined below:

- Greatest percentage of home foreclosures;
- Highest percentage of homes financed by sub-prime mortgage related loans; and
- Areas identified as the most likely to face a significant rise in foreclosures.

Percentage of Foreclosures

The number of foreclosures within the Jacksonville Metropolitan Statistical Area (MSA) for 2007 and the first quarter of 2008, per the Clerk of the Circuit Court, show that at least 51% of the foreclosures resulted in the loss of owner-occupied housing and 49% of the foreclosures resulted in loss of housing for the rental population. The attached map demonstrates this impact by zip code and census tract.

For the purposes of meeting §2301(c)(2), the five zip codes with the highest incidence of foreclosure (as highlighted on the map and in the table below) will be targeted for the largest percentage of program resources.

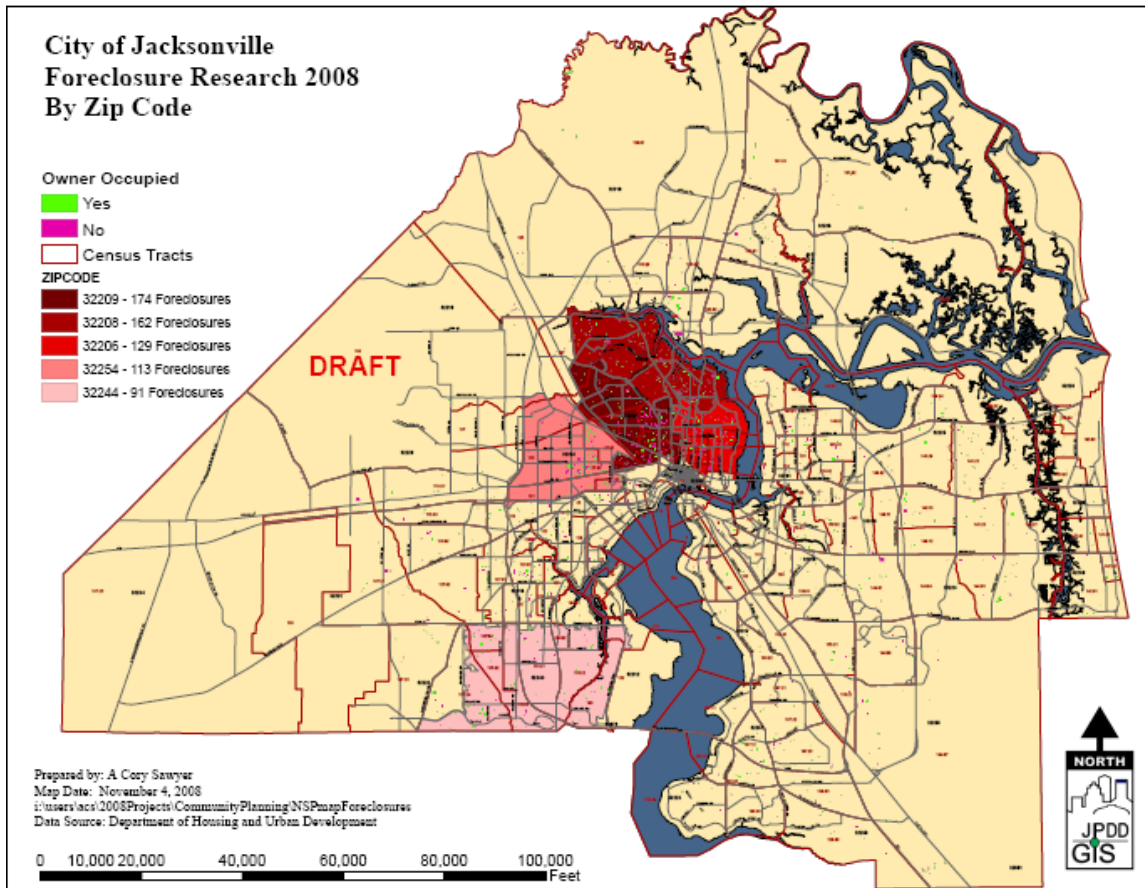


Figure 1

Five Zip Codes With Highest Foreclosure Percentage				
32209	32208	32206	32254	32244

Sub prime (High Cost Loans)

The City of Jacksonville/Duval County utilized Home Mortgage Disclosure Act (HMDA) data provided by the United States Department of Housing and Urban Development (HUD) to determine the areas that contained the highest percentage of homes financed by a sub prime mortgage loan.

For the purposes of meeting §2301(c)(2), the census tracts with the highest incidence of High Cost Loan Rate in excess of 50% (as highlighted on the map and in the table below) will be targeted for the largest percentage of program resources.

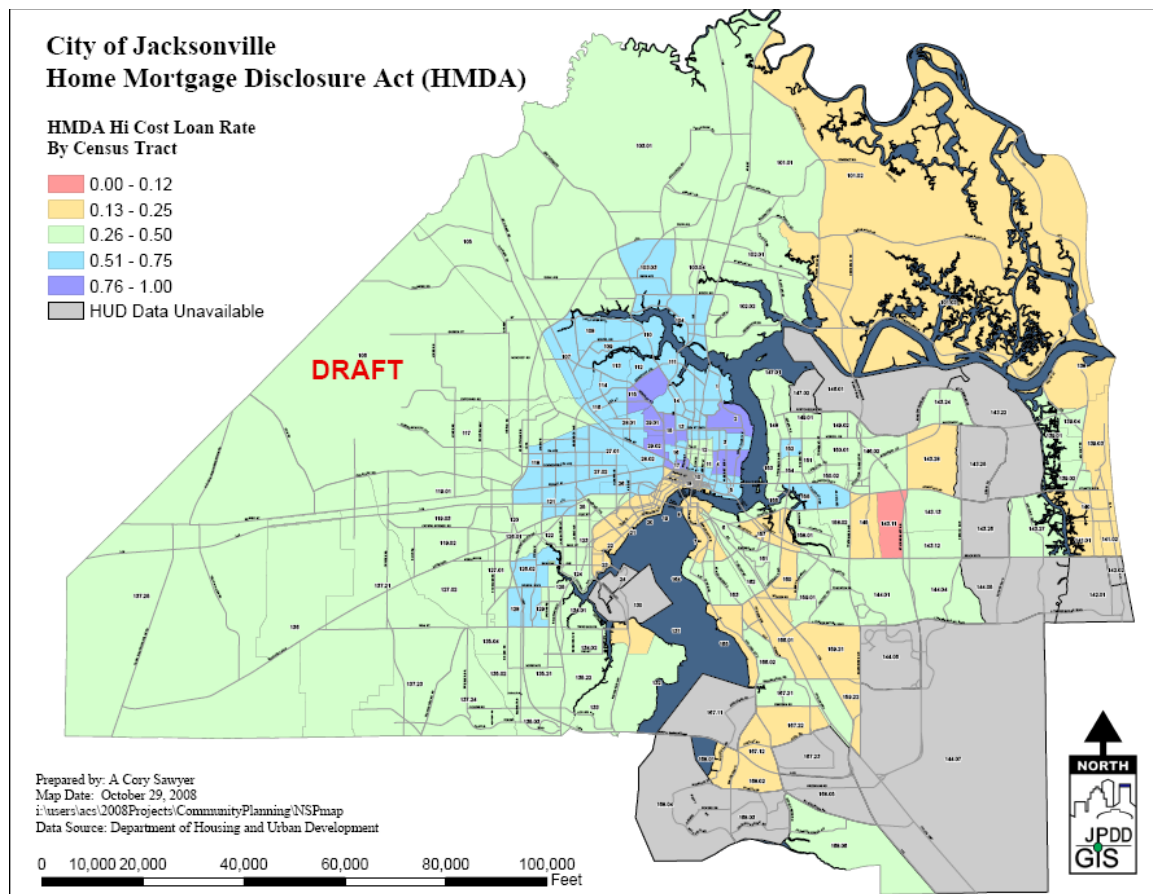


Figure 2

Census Tracts of High Cost Loan Rates					
51%-75%					
1	16	103.03	110	116	129
5	26	104	111	118	152
11	27.01	107	112	121	155
13	28.01	108	113	126.02	
14	28.02	109	114	128	

Census Tracts of High Cost Loan Rates			
76%-100%			
2	15	29.01	115
4	17	29.02	

Areas at Risk

The City of Jacksonville/Duval County utilized the Foreclosure and Abandonment Risk Scoring System provided by the United States Department of Housing and Urban Development (HUD) to determine the areas that will likely face a significant rise in the rate of home foreclosures utilizing a risk score of 10.

For the purposes of meeting §2301(c)(2), the census tracts with an estimated foreclosure abandonment risk score of 10 (as highlighted on the map and in the table below) will be targeted for the largest percentage of program resources.

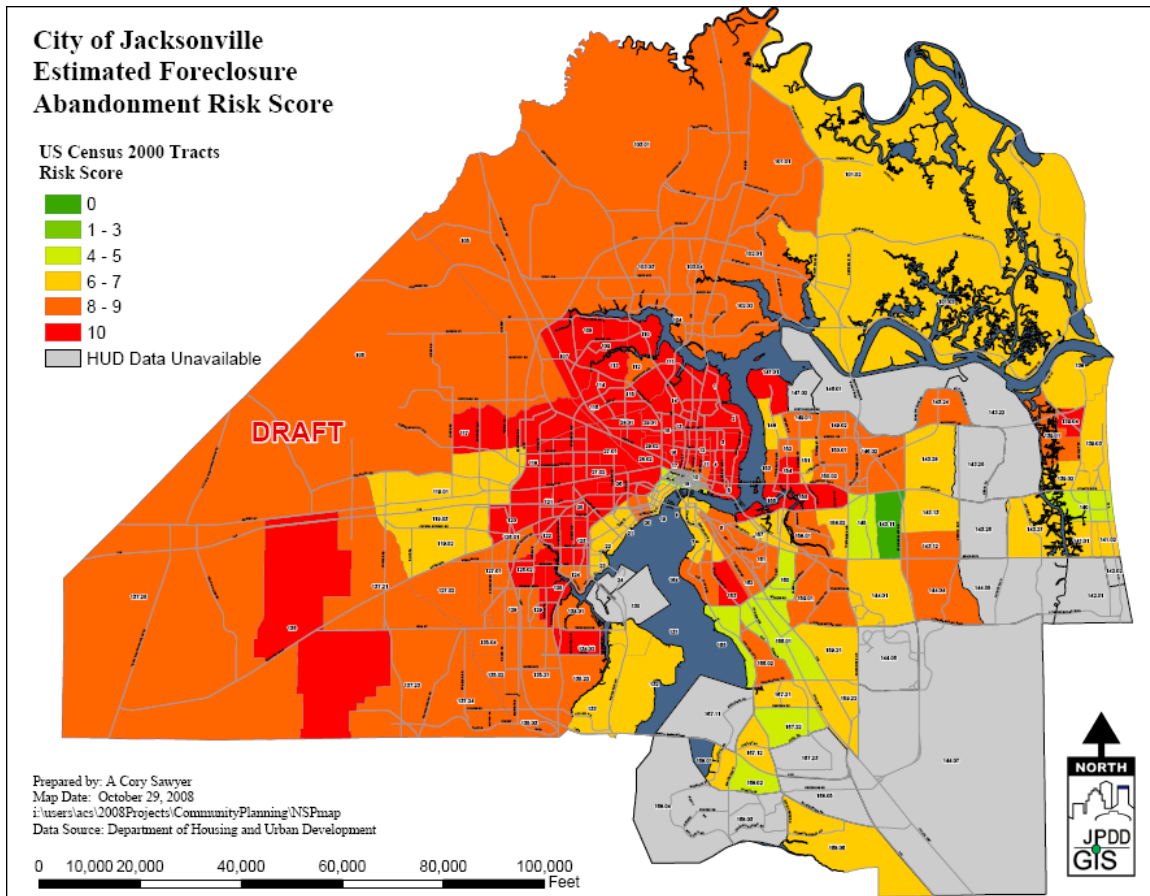
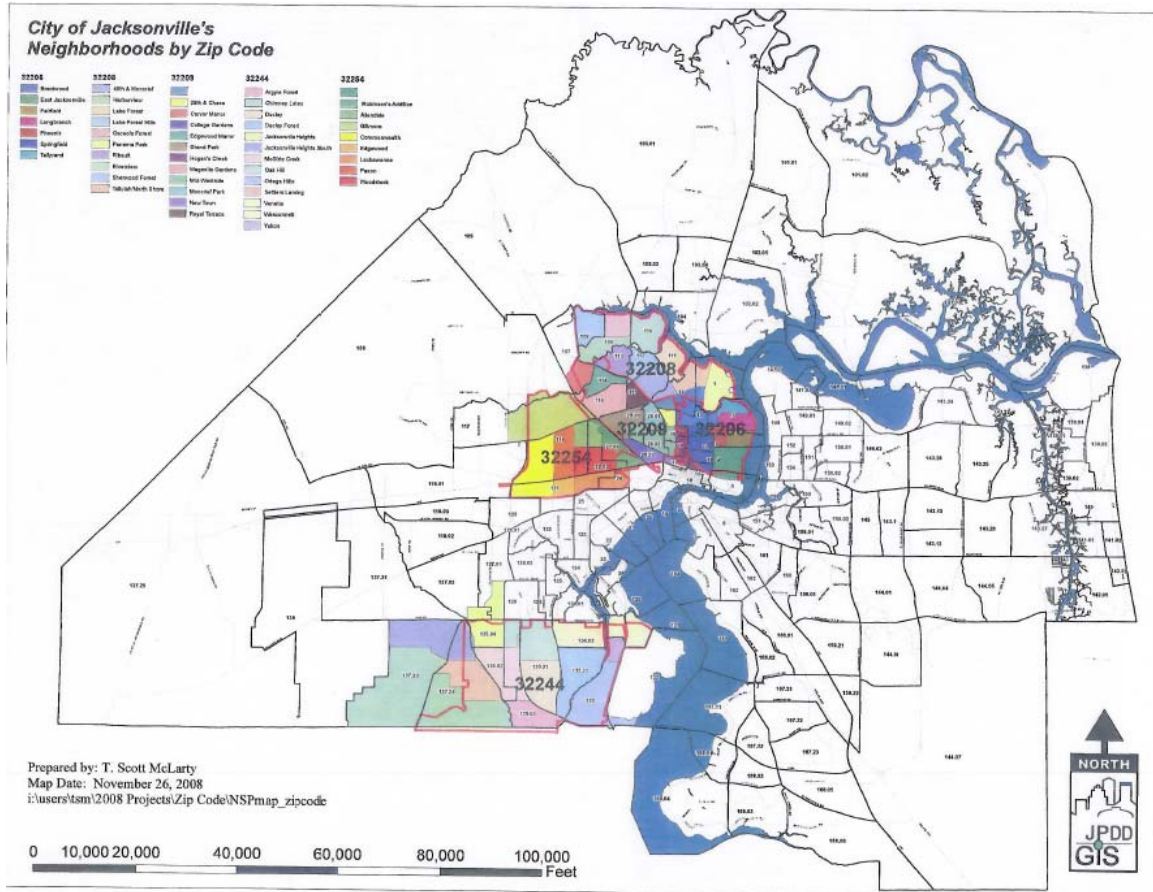


Figure 3

Census Tracts with Abandonment Risk Score of 10					
1	14	28.01	113	122	147.01
2	15	28.02	114	123	154
3	16	29.01	115	125	155
4	17	29.02	116	126.01	156
5	25	107	117	126.02	163
11	26	109	118	134.02	
12	27.01	111	120	136	
13	27.02	112	121	139.04	

Target Areas

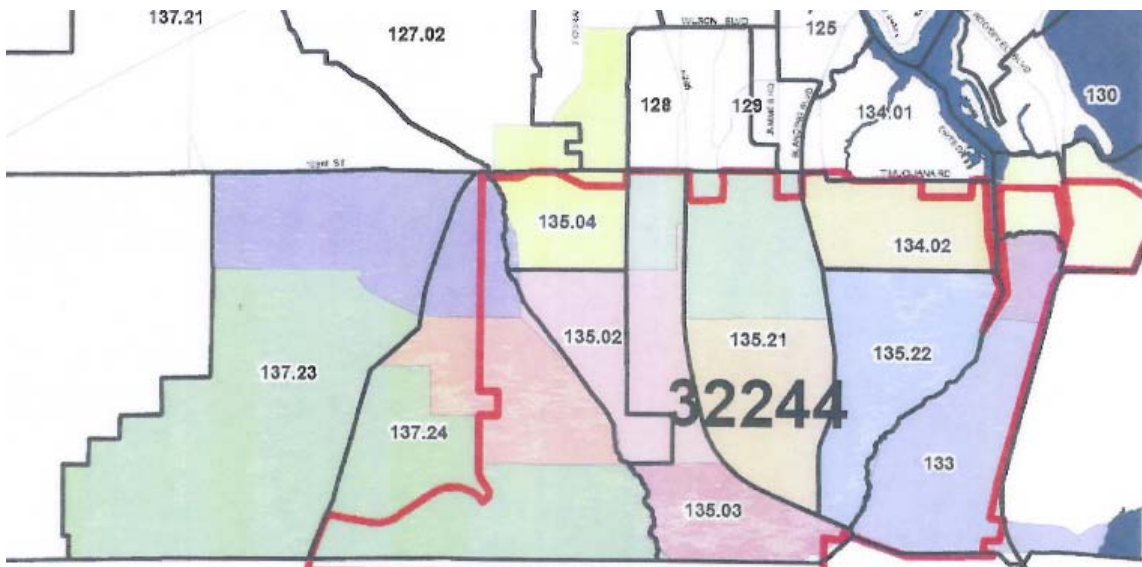
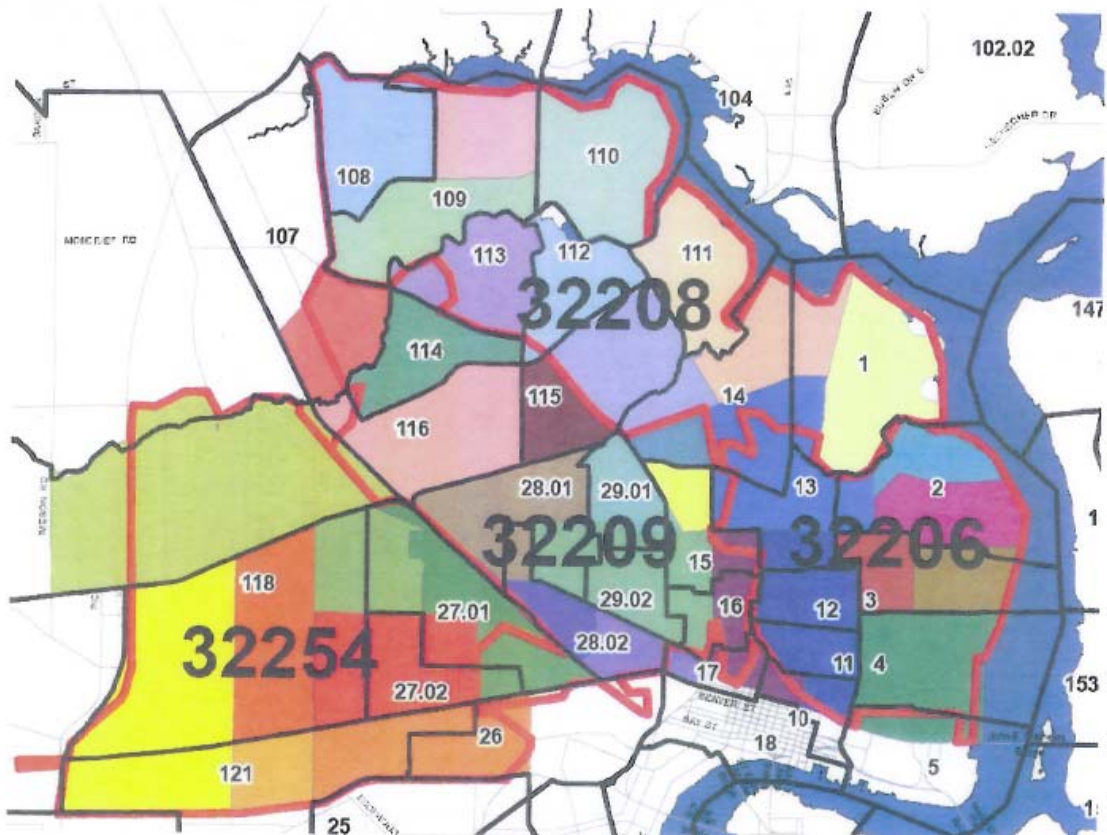
Based upon the three defined areas of need, the City of Jacksonville will target the Neighborhood Stabilization Program resources to the following identified general neighborhoods that meet one or more of the areas of need criteria.



Those neighborhoods being more clearly defined as:



Enlarged views of the targeted neighborhoods are included for additional clarity.



B. Distribution and Uses of Funds

The requirements of Section 2301(c)(2) will be met through the distribution and use of the NSP funds for the areas of greatest impact and need to include, but not limited to, the Enterprise and Empowerment Zones of the Jacksonville/Duval MSA. Based on the NSP criteria the City of Jacksonville will target the program's resources to areas identified as follows:

- The five (5) zip codes with the highest incidence of foreclosures (*based upon Figure 1*), and/or
- Census tracts with a percentage of high cost loan rates in excess of 50% (*based upon Figure 2*), and/or
- Census tracts with an abandonment risk score of 10 (*based upon Figure 3*)

The City of Jacksonville anticipates expending the program resources as follows:

City of Jacksonville NSP Allocation:

Activity Description	50% and Below	# of Units	51-120%	# of Units	Total
Administration	-	0	\$ -	0	\$ 2,617,530
Acquisition/Rehab/Resale HO	-	0	9,764,199	74	9,764,199
Acquisition/Rehab Multifamily	7,286,278	52	-0-	0	7,286,278
Demolition/Clearance	-	0	1,000,000	125	1,000,000
Land Banking	-	0	1,720,369.33	79	1,720,369.33
Financing Mechanisms	-	0	1,993,352.67	56	1,993,352.67
Redevelopment	-	0	1,793,538	19	1,793,538
TOTAL	\$ 7,286,278	52	\$ 16,271,509	353	\$ 26,175,317

The City of Jacksonville plans to utilize other funding sources including, but not limited to: federal, state and local funding and single and multi family bond proceeds in the targeted areas to maximize the impact of the Neighborhood Stabilization Program.

Through the various combined activities proposed in this amendment, it is anticipated that the targeted areas will be impacted in several ways that will ultimately stabilize the communities through the reduction of vacant or abandoned units. Some of these areas of expected impact are as follows:

- Decrease of crime in targeted neighborhoods,
- Decrease the deterioration of targeted neighborhoods,
- Increase in property values for targeted neighborhoods, and
- Stabilize the tax base in the targeted neighborhoods.

C. Definitions and Descriptions

(1) “Blighted Structure”

As defined in Section 518.111 Definitions, City of Jacksonville’s *Municipal Code* (Property Safety/Maintenance Code):

Blight, blighting influence, or blighting factors means either: that which endangers life or property by fire or other causes or that which substantially impairs or arrest property values or the sound growth of the county or city and is a menace to the public health, safety, morals or welfare in this present condition and use. This may include, but not be limited to the following factors:

- a) Faulty lot layout in relation to size, adequacy, accessibility or usefulness;
- b) Unsanitary or unsafe conditions;
- c) Deterioration of site or other improvements.

(2) “Affordable Rents”

The maximum Affordable Rents shall be based upon Section 8 fair market rents as published by HUD.

(3) “Continued Affordability”

The City of Jacksonville will ensure long term affordability through the use of mortgages, promissory notes and liens for homeownership activities and mortgages, promissory notes and Land Use Restrictions (LURA) for multi-family and land banking activities.

When NSP funds are used to finance a homebuyer program, properties must remain affordable in accordance with HOME guidelines as stated below for the applicable number of years from the date of initial purchase. If the resale of the property is completed prior to the end of the affordability period, the principal amount of the loan is immediately due and payable to the City of Jacksonville. Recaptured funds will be returned to the NSP Trust fund as program income and be used for additional activities in accordance with the NSP program.

If an owner of a single family unit ceases to occupy the property as his/her primary residence, or if the home is rented, sold, or title is transferred before the affordability period expires, the funds provided by the City of Jacksonville will be subject to recapture.

The Housing & Neighborhood’s Compliance Unit will monitor the multifamily rental developments annually during the affordability period to ensure that the specified units continue to maintain tenant affordability, tenant income eligibility and that the property(s) continue to meet minimum housing quality standards. The Housing & Neighborhood’s Finance Unit will monitor homeownership units for compliance with the terms of the recorded mortgage or other security mechanism throughout the affordability period.

The City of Jacksonville will use the minimum affordability period of the federal HOME Investment Partnership Program, 24 CFR 92.252 (e) listed below:

- Up to \$15,000 = 5 years
- \$15,000 - \$40,000 = 10 years
- Over \$40,000 = 15 years
- New Construction = 20 years

(4) ***“Housing Rehabilitation Standards”***

All NSP assisted rehabilitation must meet the minimum housing codes as defined in Title VII, City of Jacksonville’s *Municipal Code*. Building standards are established by the City of Jacksonville Building Department in conjunction with the Florida Building Code as established by the Florida Department of Community Affairs and may be revised from time to time. In addition, all units must meet HUD Housing Quality Standards (HQS) as set forth in 24 CFR 982.401. Local housing rehabilitation standards and a set of NSP-specific technical specifications have been created by the Housing and Neighborhoods Department of the City of Jacksonville. These standards may be revised from time to time.

Newly constructed housing must meet the Florida Energy Efficiency Code for Building Construction. The City of Jacksonville shall also require that all housing construction to incorporate modern, green building and energy-efficiency improvements in all NSP activities to provide for long-term affordability and increased sustainability and attractiveness of housing neighborhoods.

D. Low Income Targeting

The City of Jacksonville will set aside \$7,286,278 to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50% of area median income. It is anticipated that the majority of the funds set aside for households at or below 50% of AMI will be for rental housing. Partner’s selected to do rental activities must have a proven track record in rental property development and management. The City of Jacksonville will require that any potential multifamily developments be submitted in accordance with the City of Jacksonville’s multifamily development guidelines, a copy of which can be obtained from the Housing and Neighborhoods Department of the City of Jacksonville.

The City of Jacksonville will give scoring consideration to Partners that provide housing assistance to the special needs and homeless populations.

E. Acquisitions & Relocation

The City of Jacksonville reasonably expects to demolish or convert 193 low- and moderate -income dwelling units (i.e., ≤ 80% of area median income) as a direct result of NSP-assisted activities.

It is reasonably expected that 224 dwelling units will be made available to low-, moderate- and middle-income households—i.e., $\leq 120\%$ of area median income as indicated in “Distribution and Uses of Funds” chart. It is expected that activity on these dwelling units will begin on February 15, 2009 and be completed by January 1, 2013. It is also expected that 52 of these units will be made available to households whose income does not exceed 50 percent of area median income.

F. Public Comment

The opportunity for public comments was advertised in two (2) local newspapers with information regarding the availability of the application and the due date. The results of the public comments are summarized below.

The draft 2008 - 2009 Consolidated Plan-Action Plan was made available to the public at the Main Library and the Housing and Neighborhoods Department, as well as our website at

www.coj.net/Departments/HousingandNeighborhoods/CommunityDevelopment/2008-2009ActionPlan.html.

The 15-day public comment period was held from November 9-24, 2008 regarding the draft 2008-2009 Consolidated Plan Amendment-Neighborhood Stabilization Program. The Jacksonville Housing and Community Development Commission reviewed and approved the plan on November 19, 2008. The minutes of the meeting and the sign-in sheet are available on file in the HAND.

Once the document is finalized, and submitted to HUD for approval, it will be placed in all twenty-one libraries throughout Duval County to be accessible to all citizens specifically low and moderate income citizens of Duval County.

Public Comments Pertaining to the Neighborhood Stabilization Program (NSP)

Total Submissions with Comments: Thirteen (13)

- Ability Housing
- Operation New Hope
- Housing Partnership of Northeast Florida
- Metro North CDC
- Riverside Avondale Development Organization
- Grace and Truth CDC
- Local Initiatives Support Corporation
- Wealth Watchers, Inc.
- Jacksonville Area Legal Aid
- Langton Consulting
- Mark Beamenderfer, Gator Home Buyers
- Darryl Ransom
- Weezie Collins, Weezie Collins Realty

The City of Jacksonville received comments from local citizens, several organizations, and a number of Community Development Corporations. Issues were presented as follows:

- Several requests to limit the target area where 75% of the funds will be spent to areas where the City of Jacksonville has approved Neighborhood Action Plans (NAP);
- A number of organizations requested that the City give a preference to nonprofit CDCs, particularly as it relates to areas where those established organizations are already working;
- There were also a number of requests for the City to give a right of first refusal for properties within these target areas to the established CDCs.
- There was a common concern that selected organizations have a proven track record and capacity to carry out NSP activities, and would also perform the activities which would be in the neighborhood's best interest ;
- Several respondents voiced concern about the need to help the new home owners acquire the proper financial tools for their individual situations;
- Several suggested the City only partner with established CDCs and other small local businesses with proven track records for success and progress versus that of an investor with the sole goal of making large profits from others misfortune.

Copies of all comments can be reviewed in the City of Jacksonville's Housing and Neighborhoods Department.

G. NSP Information by Activity

Under the City of Jacksonville Procurement Code, Chapter 126, "solicitation of purchases that exceed the applicable formal threshold shall, at a minimum, consists of advertising or notification in a newspaper of general circulation in the City at least twenty-one (21) calendar days prior to the public opening date set forth in the solicitation, and at least five (5) calendar days prior to any scheduled pre-bid or pre-proposal conference...however, in no case shall the number of advertising or notification days be less than ten (10) calendar days for a formal purchase, unless deemed an emergency by the Chief of Procurement or his/her designee."

Under the requirements of the Procurement Code, the City of Jacksonville intends to develop multiple Requests for Proposals (RFP) for partners to assist with the acquisition, rehabilitation, management and disposition of properties. Such partners may include, but not be limited to, housing non-profits/for-profits, lenders, title companies, asset/property managers, appraisers, real estate companies, contractors (including demolition contractors) and inspection firms. The Housing and Neighborhoods Department will work closely with the Procurement Division to request and review the RFP's on an expedited basis so that program activities can begin as quickly as possible.

Critical areas that the City of Jacksonville will consider in selecting non-profit and for-profit partners will include: capacity, proven track record, and the applicants ability to leverage private to public dollars. The City of Jacksonville specifically encourages developer partners to leverage 60% of the cost of the activity, with the public portion not to exceed 40%. To further incentivize the acquisition and development of residential units, developers may request a greater City investment into the project, providing that the amount does not exceed \$99,000.

The City will enter into formal contractual agreements with the selected partners for the awarded activity. These contracts will outline the services being procured, maximum amounts of indebtedness, regulatory requirements, and performance schedules and will allow for the de-obligation of the contract amount in the event that the partner fails to follow the contractual provisions.

ACTIVITY 1 – Acquisition / Rehabilitation / Resale

- (1) **Activity Name:** Acquisition/Rehabilitation/Resale – Single Family Homeownership and Multifamily Rental (Tenure type: homeownership and rental)
- (2) **Activity Type:**
Eligible Activities
 - HERA 2008 §2301(c)(3)(B) – Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties.
 - 24 CFR 570.201
 - (a) Acquisition
 - (b) Disposition
 - (n) Direct homeownership assistance
 - 24 CFR 570.202(a) – Eligible rehabilitation and preservation activities for homes and other residential properties
 - 24 CFR 570.206 – Activity delivery costs for an eligible activity (as modified by the NSP)
- (3) **National Objective:**
 - This activity will benefit Low, Moderate and Middle Income Household(s) (LMMH) under 24 CFR 570.208(a)(3)-Housing Activities
 - This activity provides or improves permanent residential structures that will be occupied by a LMMH whose income is at or below 120 percent of area median income
- (4) **Activity Description:**
NSP funds will be used for the acquisition, rehabilitation and resale of single and multifamily housing. The benefit to this activity is to have decent, safe, sanitary and affordable housing available to families with low, moderate or middle income

levels. The minimum purchase discount for all properties purchased with NSP funds shall be at least 1 percent. While the City of Jacksonville does not anticipate any relocation due to this activity, if relocation is triggered, the City has available federal and state funding to meet the regulations as established under the Uniform Relocation Act (URA).

(5) **Location Description:**

This activity will be carried out in the target areas.

(6) **Performance Measures:**

Any contractual agreements will outline the services being procured, maximum amounts of indebtedness, regulatory requirements, and performance schedules and will allow for the de-obligation of the contract amount in the event that the partner fails to follow the contractual provisions. All Housing Partners will be monitored quarterly for compliance.

Income Level	Single-Family Units*	Multi-Family Units**
Low Income (0-50% AMI)	0	52
Moderate Income (51-80% AMI)	22	0
Middle Income (81-120% AMI)	52	0
Total Projected Units	74	52

(7) **Total Budget:**

Income Level	Single-Family	Multi-Family
Low Income (0-50% AMI)	\$ 0	\$ 7,286,278
Moderate/Middle Income (51-120% AMI)	9,764,199	0
Total Projected Budget	\$ 9,764,199	\$ 7,286,278

(8) **Responsible Organization:** City of Jacksonville, Housing and Neighborhoods Department, 214 N Hogan Street, 8th floor, Jacksonville, FL 32202; Wight Greger, Director. The City of Jacksonville will solicit through multiple Requests for Proposals organizations/partners to participate in this activity.

(9) **Projected Start Date:** February 15, 2009

(10) **Projected End Date:** January 1, 2013

(11) **Specific Activity Requirements:**

Eligible units will meet the following criteria:

- Property must have been foreclosed upon, and
- Property must be vacant

The Housing & Neighborhoods Department (HAND) will work with lenders and investors to obtain a list of homes that have been foreclosed, vacant for at least 90 days and are on a lender's or investor's current inventory. Once foreclosed properties have been identified in the target areas, the City of Jacksonville will negotiate with the lender(s) and or investor(s) to obtain the maximum reasonable discount for use in the program. The minimum purchase discount for all properties purchased with NSP funds shall be at least 1 percent.

The City of Jacksonville will then provide the Housing Partners with a list of available properties in the targeted areas. The City of Jacksonville will provide funding at 0% interest to the approved Housing Partners to acquire the properties. The Housing Partners will reimburse the City of Jacksonville an amount determined by the homeowner's affordability requirements upon conversion to permanent, primary mortgage financing. These reimbursements will constitute program income and will be recycled to eligible NSP activities. If the property is not sold within 12 months of availability then the property may be converted into rental unit(s). The City of Jacksonville will require the minimum affordability period as stated in the HOME Investment Partnership Program. The principal amount of the mortgage will be payable upon maturity and the recaptured funds will be returned to the NSP Trust fund as program income and be used for additional activities in accordance with the NSP program. The affordability period will be separately guaranteed through the recording of a Land Use Restriction (LURA). The City of Jacksonville will limit the number of properties that the Housing Partners can obtain based on their capacity.

In most cases, housing units acquired through the use of NSP funds will require rehabilitation. The City of Jacksonville will provide NSP funds for housing rehabilitation to bring the housing units up to the City of Jacksonville's minimum housing code as defined in Title VIII, City of Jacksonville's *Municipal Code*. Funding will be provided through a secured lien on the property at 0% interest until the unit is transferred to an eligible occupant. Upon transfer of the property to an eligible occupant, the Housing Partner's loan will be due and payable to the City and recaptured as program income.

The NSP program will rehabilitate both single family and multifamily residential property. Costs of the rehabilitation can include labor, materials, supplies, permits, lead paint assessment, abatement and clearance, barrier removal, energy efficient measures asbestos removal and program delivery. If, upon evaluation by a certified housing inspector, the cost to rehabilitate the unit is estimated to be greater than fifty percent (50%) of the after-rehabilitation appraisal value, the City of Jacksonville may recommend that the unit be demolished.

Housing Partner(s) must sell an acquired home to an eligible homeowner as an affordable unit within twelve months. Per the City of Jacksonville's Local Housing

Assistance Plan as adopted by City Council, an affordable unit is defined as a unit in which the monthly rent or mortgage payment including taxes and insurance does not exceed 30 percent of the monthly gross income for the household. This is based on monthly housing payments (PITI) of not more than 30 percent. However, it is not the intent to limit an individual household's ability to devote more than 30 percent of its income for housing. Housing for which a household devotes more than 30 percent of its income shall be deemed affordable, if the first institutional mortgage lender is satisfied that the household can afford monthly payments in excess of the 30 percent benchmark.

A portion of the NSP funds used for Housing Rehabilitation may remain in the home when it is sold to an income eligible household in the form of gap financing. Gap financing will be in the form of a secured 0% interest loan that shall be due and payable should the property cease to be the primary residence of the borrower, or if the home is rented, sold, or title is transferred. The funding may reduce interest rates, mortgage principal amounts, provide a second mortgage and pay the purchaser's reasonable closing costs. The amount of down payment assistance that will be left behind as a deferred payment loan will be adjusted according to income and need of the household. NSP funds may be used for no more than 50% of any required down payment. The remaining 50% may be funded through the use of other public or private funding sources. As long as the borrower/owner maintains the property as their principal homestead residence during the period of affordability, the loan will remain deferred. Single family and multifamily housing units assisted under this activity will have a recorded security position in order to ensure continued affordability. Recaptured funds will be returned to the NSP Trust fund as program income and be used for additional activities in accordance with the NSP program.

All homebuyers will be required to have at a minimum 8 hours of homebuyer counseling from a housing counseling agency as approved by the City of Jacksonville's Housing and Neighborhoods Department prior to obtaining a mortgage loan.

The City of Jacksonville will use the minimum affordability standards under the federal HOME Investment Partnership Program which are listed below:

- Up to \$15,000 = 5 Years
- \$15,001 - \$40,000 = 10 Years
- Over \$40,000 = 15 Years
- New Construction = 20 Years

It is anticipated that a portion of the funds associated with this activity will be for households earning at or below 50% of AMI. This could be in the form of a rehabilitated single family or multifamily unit.

The City of Jacksonville will provide scoring considerations for partners proposing improving energy efficiency, conservation, or providing renewable energy source(s). These types of features will provide for long-term affordability and increased sustainability and attractiveness of housing and neighborhoods. If an abandoned or foreclosed-upon home or residential property is to be sold to an individual as a primary residence, no profit may be earned on such sale. Program income received from the sale or rental of assisted multifamily units will be recycled for eligible NSP activities.

All NSP assisted rehabilitation must meet the minimum housing codes as defined in Title VII, City of Jacksonville's *Municipal Code* and the NSP-specific technical specifications. Building standards are established by the City of Jacksonville Building Department in conjunction with the Florida Building Code as established by the Florida Department of Community Affairs and may be revised from time to time. In addition, all units must meet HUD Housing Quality Standards (HQS) as set forth in 24 CFR 982.401.

The City of Jacksonville will allow and pay for development fees that are fair and reasonable as part of the acquisition and rehabilitation process. Development fees and other soft/project related costs associated with the acquisition and rehabilitation shall be considered "Program Delivery" type costs and will be charged to the individual projects assisted. Development fees will be limited based upon program policies and procedures as outlined in the current Comprehensive Plan and Local Housing Assistance Plan as approved and adopted by City Council. These documents may be revised from time to time.

ACTIVITY 2 – Demolition / Clearance

- (1) **Activity Name:** Demolition/Clearance of Vacant, Blighted Structures (Tenure type: homeownership)
- (2) **Activity Type:**
 - HERA 2008 §2301(c)(3)(D) – Demolish blighted structures
 - 24 CFR 570.201(d) – Clearance and Demolition of blighted structures only
- (3) **National Objective:**
 - This activity will benefit Low, Moderate and Middle Income Household(s) (LMMH) under 24 CFR 570.208(a)(3)-Housing Activities
 - This activity provides or improves permanent residential structures that will be occupied by a LMMH whose income is at or below 120 percent of area median income
- (4) **Activity Description:**

If there is a vacant structure that has become a safety factor and or said vacant structure has added to the downturn in values for the area the funds would be used to demolish the structure and clear the property. This activity will compliment the

current CDBG Demolition / Clearance activity currently in place and budgeted at \$450,000.

(5) **Location Description:**

This activity will be carried out in the target areas.

(6) **Performance Measures:**

Any contractual agreements will outline the services being procured, maximum amounts of indebtedness, regulatory requirements, and performance schedules and will allow for the de-obligation of the contract amount in the event that the partner fails to follow the contractual provisions. All Housing Partners will be monitored quarterly for compliance.

	Demolition / Clearance Units*
Total Projected Units	125

(7) **Total Budget:**

	Demolition/Clearance
Total Projected Budget	\$ 1,000,000

(8) **Responsible Organization:**

City of Jacksonville, Housing and Neighborhoods Department, 214 N Hogan Street, 8th floor, Jacksonville, FL 32202; Wight Greger, Director. HAND will partner with the City of Jacksonville's Environmental and Compliance Department, Municipal Code Compliance Division.

(9) **Projected Start Date:** February 15, 2009

(10) **Projected End Date:** January 1, 2013

(11) **Specific Activity Requirements:**

Eligibility will be determined based upon a recommendation from the City's Environmental and Compliance Department, Municipal Code Compliance Division or for properties in which the estimated rehabilitation cost exceeds 50% of the appraised value of the property.

The City of Jacksonville's Municipal Code and Compliance Division will identify blighted structures within the target areas. Structures which substantially impair or arrest property values or which are a menace to public health, safety, morals or welfare in its present condition and use will be demolished.

ACTIVITY 3 – Land Banking

(1) **Activity Name:** Land Banking (Tenure type: homeownership)

(2) **Activity Type:**

- HERA 2008 §2301(c)(3)(C) – Establish land banks for homes that have been foreclosed upon.
- 24 CFR 570.201
 - (a) – Acquisition
 - (b) – Disposition (including maintenance)

(3) **National Objective:**

24 CFR 570.208(a)(3) – Housing Activities

- This activity will benefit Low, Moderate and Middle Income Household(s) (LMMH) under 24 CFR 570.208(a)(3)-Housing Activities
 - This activity provides or improves permanent residential structures that will be occupied by a LMMH whose income is at or below 120 percent of area median income

(4) **Activity Description:**

A land banking entity will be selected to assemble, temporarily manage and dispose of vacant land in all areas of greatest need for the purpose of stabilizing neighborhoods and to encourage re-use or redevelopment of urban property. The minimum purchase discount for all properties purchased with NSP funds shall be at least 1 percent.

(5) **Location Description:**

This activity will be carried out in the target areas.

(6) **Performance Measures:**

Any contractual agreements will outline the services being procured, maximum amounts of indebtedness, regulatory requirements, and performance schedules and will allow for the de-obligation of the contract amount in the event that the partner fails to follow the contractual provisions. All Housing Partners will be monitored quarterly for compliance.

Income Level	Land Banking Units
Low Income (0-50% AMI)	0
Moderate Income (51-80% AMI)	79
Middle Income (81-120% AMI)	0
Total Projected Units	79

(7) **Total Budget:**

Income Level	Land Banking
Low Income (0-50% AMI)	\$ 0
Moderate/Middle Income (51-120% AMI)	1,720,369.33
Total Projected Budget	\$ 1,720,369.33

(8) **Responsible Organization:**

City of Jacksonville, Housing and Neighborhoods Department, 214 N Hogan Street, 8th floor, Jacksonville, FL 32202; Wight Greger, Director. The City of Jacksonville will solicit through multiple Requests for Proposals organizations/partners to participate in this activity.

(9) **Projected Start Date:** February 15, 2009

(10) **Projected End Date:** January 1, 2013

(11) **Specific Activity Requirements:**

The land bank will be used to maintain, assemble, facilitate redevelopment of, market, and dispose of undeveloped properties. In no case will the property be held in excess of ten (10) years without obligating it to an eligible NSP use.

The City of Jacksonville and/or Housing Partners will purchase developed and/or undeveloped properties that are sized for the construction of housing units, zoned appropriately and have established infrastructure. However, if a property does not meet the listed criteria but is located adjacent to a property that does meet the criteria and can be combined with said property it may be added to the land bank.

Upon sale or transfer of the property from the land bank, recaptured funds will be returned to the NSP Trust fund as program income and be used for additional activities in accordance with the NSP program.

ACTIVITY 4 – Financing Mechanisms

- (1) **Activity Name:** Financing Mechanisms for Purchase and Redevelopment of Foreclosed Homes and Other Residential Properties (Tenure-type: homeownership)
- (2) **Activity Type:**
 - HERA 2008 §2301(c)(3)(A) – Establish financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-second, loan loss reserves, and shared equity loans for low- and moderate-income homebuyers.
 - 24 CFR 570.201(n) Direct Homeownership Assistance
- (3) **National Objective:**
 - This activity will benefit Low, Moderate and Middle Income Household(s) (LMMH) under 24 CFR 570.208(a)(3)-Housing Activities
 - This activity provides or improves permanent residential structures that will be occupied by a LMMH whose income is at or below 120 percent of area median income
- (4) **Activity Description:**

Mechanisms for the purchase and redevelopment of foreclosed upon properties, including (but not limited to) soft second, loan loss reserves and shared-equity loans. This activity could also include delivery costs associated with the issuance of single family bond issues by the local HFA. However, the City's resale/recapture policy will apply to all properties purchased under NSP.
- (5) **Location Description:**

This activity will be carried out in the target areas.

(6) **Performance Measures:**

Any contractual agreements will outline the services being procured, maximum amounts of indebtedness, regulatory requirements, and performance schedules and will allow for the de-obligation of the contract amount in the event that the partner fails to follow the contractual provisions. All Housing Partners will be monitored quarterly for compliance.

Income Level	Public Financing*	Private Financing**
Low Income (0-50% AMI)	0	0
Moderate Income (51-80% AMI)		0
Middle Income (81-120% AMI)	56	56
Total Projected Units	56	56

*Public financing provided in the form of downpayment assistance based on an estimated maximum cost of \$40,000 per unit.

**Private financing provided in the form of first mortgages based on an estimated first mortgage amount of \$82,000 per unit.

(7) **Total Budget:**

Income Level	Public Financing	Private Financing
Low Income (0-50% AMI)	\$ 0	\$ 0
Moderate/Middle Income (51-120% AMI)	1,993,352.67	10,000,000
Total Projected Budget	1,993,352.67	\$ 10,000,000

(8) **Responsible Organization:**

City of Jacksonville, Housing and Neighborhoods Department, 214 N Hogan Street, 8th floor, Jacksonville, FL 32202; Wight Greger, Director. The City of Jacksonville will solicit through multiple Requests for Proposals organizations/partners to participate in this activity.

(9) **Projected Start Date:** February 15, 2009

(10) **Projected End Date:** January 1, 2013

(11) **Specific Activity Requirements:**

Down payment assistance will be in the form of a 0% interest loan, secured by a mortgage and promissory note, that shall be due and payable should the property cease to be the primary residence of the borrower, or if the home is rented, sold, or title is transferred. The funding may reduce interest rates, mortgage principal amounts, provide a second mortgage and pay the purchaser's reasonable closing costs. The amount of assistance that will be left behind as a deferred payment loan will be adjusted according to income and need, but in no instance will the down payment assistance provided through the NSP program exceed 50% of the down

payment. As long as the borrower/owner maintains the property as their principal homestead residence during the period of affordability, the loan will remain deferred. Recaptured funds will be returned to the NSP Trust fund as program income and be used for additional activities in accordance with the NSP program.

The City of Jacksonville will use the minimum affordability standards under the federal HOME Investment Partnership Program which are listed below:

- Up to \$15,000 = 5 Years
- \$15,001 - \$40,000 = 10 Years
- Over \$40,000 = 15 Years
- New Construction = 20 Years

ACTIVITY 5 – Redevelopment

(1) **Activity Name:** Redevelopment of Demolished or Vacant Properties (Including Buildings) (Tenure-type: homeownership)

(2) **Activity Type:**

- HERA 2008 §2301(c)(3)(E) – Redevelop demolished or vacant properties
- 24 CFR 570.201
 - (a) Acquisition
 - (b) Disposition
 - (c) Public Facilities and Improvements
 - (d) Public Services - Homeownership Counseling
 - (n) Direct Homeownership Assistance
- 24 CFR 570.204 Activities by Community Based Development Organizations

(3) **National Objective:**

- This activity will benefit Low, Moderate and Middle Income Household(s) (LMMH) under 24 CFR 570.208(a)(3)-Housing Activities
 - This activity provides or improves permanent residential structures that will be occupied by a LMMH whose income is at or below 120 percent of area median income

(4) **Activity Description:**

The construction of single family units on vacant property will take place in all three areas of greatest need providing housing for households at or below 120% AMI.

(5) **Location Description:**

This activity will be limited to existing Community Housing Development Organization (CHDO) areas which are located within the target areas.

(6) **Performance Measures:**

Any contractual agreements will outline the services being procured, maximum amounts of indebtedness, regulatory requirements, and performance schedules and will allow for the de-obligation of the contract amount in the event that the partner fails to follow the contractual provisions. All Housing Partners will be monitored quarterly for compliance.

Income Level	Re-Development Units*
Low Income (0-50% AMI)	0
Moderate Income (51-80% AMI)	19
Middle Income (81-120% AMI)	0
Total Projected Units	19

*Based on an estimated redevelopment cost of \$143,000 per unit.

(7) **Total Budget:** (Include public and private components)

Income Level	Re-Development
Low Income (0-50% AMI)	\$ 0
Moderate/Middle Income (51-120% AMI)	1,793,538
Total Projected Budget	\$ 1,793,538

(8) **Responsible Organization:**

City of Jacksonville, Housing and Neighborhoods Department, 214 N Hogan Street, 8th floor, Jacksonville, FL 32202; Wight Greger, Director. The City of Jacksonville will solicit through multiple Requests for Proposals organizations/partners to participate in this activity.

(9) **Projected Start Date:** February 15, 2009

(10) **Projected End Date:** January 1, 2013

(11) **Specific Activity Requirements:**

Financing will be provided as a 0% deferred payment loan. Once construction has been completed, these homes will be made available to income-eligible households. The Housing Partners will reimburse the City of Jacksonville an amount determined by the homeowner's affordability requirements upon conversion to permanent, primary mortgage financing. These reimbursements will constitute program income under the program and will be recycled to eligible NSP activities. The City of Jacksonville will use the minimum affordability standards of 20 years under the federal HOME Investment Partnership Program for new construction. Continued affordability will be ensured through the use of a recorded security document in the form of a mortgage and note against the subject property. Recaptured funds will be returned to the NSP Trust fund as program income and be used for additional activities in accordance with the NSP program.

CERTIFICATIONS

- (1) **Affirmatively further fair housing.** The jurisdiction will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-lobbying.** The jurisdiction will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (3) **Authority of Jurisdiction.** The jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (4) **Consistency with Plan.** The housing activities to be undertaken with NSP funds are consistent with its consolidated plan, which means that NSP funds will be used to meet the congressionally identified needs of abandoned and foreclosed homes in the targeted area set forth in the grantee's substantial amendment.
- (5) **Acquisition and relocation.** The jurisdiction will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the Notice for the NSP program published by HUD.
- (6) **Section 3.** The jurisdiction will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (7) **Citizen Participation.** The jurisdiction is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (8) **Following Plan.** The jurisdiction is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.
- (9) **Use of funds in 18 months.** The jurisdiction will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008 by using, as defined in the NSP Notice, all of its grant funds within 18 months of receipt of the grant.
- (10) **Use NSP funds \leq 120 of AMI.** The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.
- (11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by

assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

(12) **Excessive Force.** The jurisdiction certifies that it has adopted and is enforcing: (1) a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and (2) a policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.

(13) **Compliance with anti-discrimination laws.** The NSP grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

(14) **Compliance with lead-based paint procedures.** The activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.

(15) **Compliance with laws.** The jurisdiction will comply with applicable laws.

Kerri Stewart
Signature/Authorized Official

12/1/2008
Date

Mayor
Title

Kerri Stewart
Deputy Chief Administrative Officer
For: Mayor John Peyton
Under Authority of:
Executive Order No. 07-12

NSP Substantial Amendment Checklist

For the purposes of expediting review, HUD asks that applicants submit the following checklist along with the NSP Substantial Amendment and SF-424.

Contents of an NSP Action Plan Substantial Amendment

Jurisdiction(s): City of Jacksonville (identify lead entity in case of joint agreements)	NSP Contact Person: Wight Greger Director Housing & Neighborhoods 214 N. Hogan Street, 8th Floor Jacksonville, FL 32202 Telephone(904) 255-8204 Fax: (904) 255-8285 Email: wgreger@coj.net
Jurisdiction Web Address: www.coj.net/Departments/Housing+and+Neighborhoods/default.htm	

The elements in the substantial amendment required for the Neighborhood Stabilization Program are:

A. AREAS OF GREATEST NEED

Does the submission include summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction?

Yes ☒ No ☐ Verification found on page 5 - 9.

B. DISTRIBUTION AND USES OF FUNDS

Does the submission contain a narrative describing how the distribution and uses of the grantee's NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures?

Yes ☒ No ☐ Verification found on page 10.

Note: The grantee's narrative must address the three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

C. DEFINITIONS AND DESCRIPTIONS

For the purposes of the NSP, do the narratives include:

- a definition of "blighted structure" in the context of state or local law,
Yes ☒ No ☐ Verification found on page 11.
- a definition of "affordable rents,"
Yes ☒ No ☐ Verification found on page 11.

- a description of how the grantee will ensure continued affordability for NSP assisted housing,
Yes ☒ No ☐. Verification found on page 11-12.
- a description of housing rehabilitation standards that will apply to NSP assisted activities?
Yes ☒ No ☐. Verification found on page 12.

D. LOW INCOME TARGETING

- Has the grantee described how it will meet the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
Yes ☒ No ☐. Verification found on page 12.
- Has the grantee identified how the estimated amount of funds appropriated or otherwise made available will be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50% of area median income?
Yes ☒ No ☐. Verification found on page 12.
Amount budgeted = \$6,600,000.

E. ACQUISITIONS & RELOCATION

Does grantee plan to demolish or convert any low- and moderate-income dwelling units?
Yes ☒ No ☐. (If no, continue to next heading)
Verification found on page 13.

If so, does the substantial amendment include:

- The number of low- and moderate-income dwelling units—i.e., $\leq 80\%$ of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities?
Yes ☒ No ☐. Verification found on page 13.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., $\leq 120\%$ of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion)?
Yes ☒ No ☐. Verification found on page 13.
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income?
Yes ☒ No ☐. Verification found on page 13.

F. PUBLIC COMMENT PERIOD

Was the proposed action plan amendment published via the grantee jurisdiction's usual methods and on the Internet for no less than 15 calendar days of public comment?

Yes ☒ No ☐ Verification found on page 13.

Is there a summary of citizen comments included in the final amendment?

Yes ☒ No ☐ Verification found on page 13-14.

G. INFORMATION BY ACTIVITY

Does the submission contain information by activity describing how the grantee will use the funds, identifying:

- eligible use of funds under NSP,
Yes ☒ No ☐ Verification found on page 15, 19, 21, 23, 25.
- correlated eligible activity under CDBG,
Yes ☒ No ☐ Verification found on page 15, 19, 21, 23, 25.
- the areas of greatest need addressed by the activity or activities,
Yes ☒ No ☐ Verification found on page 16, 20, 21, 23, 25.
- expected benefit to income-qualified persons or households or areas,
Yes ☒ No ☐ Verification found on page 16, 20, 22, 24, 26.
- does the applicant indicate which activities will count toward the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
Yes ☒ No ☐ Verification found on page 16.
- appropriate performance measures for the activity,
Yes ☒ No ☐ Verification found on page 16, 20, 22, 24, 26.
- amount of funds budgeted for the activity,
Yes ☒ No ☐ Verification found on page 16, 20, 22, 24, 26.
- the name, location and contact information for the entity that will carry out the activity,
Yes ☒ No ☐ Verification found on page 16, 20, 22, 24, 26.
- expected start and end dates of the activity?
Yes ☒ No ☐ Verification found on page 16, 20, 22, 24, 26.
- If the activity includes acquisition of real property, the discount required for acquisition of foreclosed upon properties,

Yes ☒ No ☐ Verification found on page 17, 21.

- If the activity provides financing, the range of interest rates (if any),
Yes ☒ No ☐ Verification found on page 17, 24, 26.

- If the activity provides housing, duration or term of assistance,
Yes ☒ No ☐ Verification found on page 17, 24, 26.

- tenure of beneficiaries (e.g., rental or homeownership),
Yes ☒ No ☐ Verification found on page 17, 24, 26.

- does it ensure continued affordability?
Yes ☒ No ☐ Verification found on page 18, 24, 26.

H. CERTIFICATIONS

The following certifications are complete and accurate:

- | | | |
|--|---|-----------------------------|
| (1) Affirmatively furthering fair housing | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-lobbying | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Authority of Jurisdiction | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) Consistency with Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (5) Acquisition and relocation | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (6) Section 3 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (7) Citizen Participation | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (8) Following Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (9) Use of funds in 18 months | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (10) Use NSP funds \leq 120 of AMI | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (11) No recovery of capital costs thru special assessments | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (12) Excessive Force | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (13) Compliance with anti-discrimination laws | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (14) Compliance with lead-based paint procedures | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (15) Compliance with laws | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |