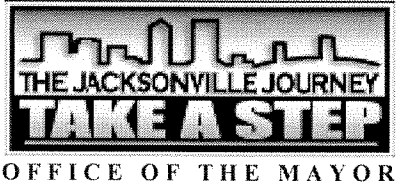




Neighborhood Safety and Stability Subcommittee
3/13/08

This packet contains handouts that were distributed at the Neighborhood Safety and Stability Subcommittee meeting on March 13, 2008 and includes the following items:

- Legal Aid Inc. statement on Crime-Free Multi-Family Housing
- Recommendations from Crime-Free Multi-Family Housing Work Group



Public Record Information Packet Checklist

Meeting Information

Subcommittee and Workgroup Name	NSS Crime free
Date of Meeting	3/13
Information Provided By	Savage

Please check off what is supplied in the Public Record Information Packet for this meeting (put n/a if appropriate):

Agenda	X
Handwritten Minutes	n/a
Typed Minutes	n/a
Handouts	X
Sign-In Sheets	X
Comment Cards	X

Statement from Jacksonville Area Legal Aid, Inc.
Crime-Free Multi-Family Housing Work Group

Regarding the proposals contained in the February 28 minutes of your workgroup (which, I understand, might have been modified at your March 6 meeting), there are a number of excellent suggestions which would have a positive impact upon the problems your committee is investigating. The recommendations show a good grasp of the issues and some significant action items to bring about change. There are a small number of recommendations, however, which might need some alteration or massaging to avoid either legal or policy pitfalls. I'll highlight these further for your consideration.

1) The recommendation regarding the database of evicted persons is perhaps the most fraught with concern. The recommendation only speaks of a database ensuring that people who are *evicted* do not get re-housed by apartment communities. As your committee is set up to deal with crime issues, I was concerned that the database did not appear to be limited to those evicted for criminal acts. The vast majority of folks evicted are for non-payment of rent – hardly a *crime*. If folks evicted for non-payment, barking dogs, and other non-criminal matters are denied housing by this effort in addition to the criminal element, it would not only be unfair, but would tremendously exacerbate Jacksonville's homelessness problem. As a matter of public policy, this suggestion would be a major concern if the prohibition for re-housing is not focused on those evicted for serious violent or drug related crimes, rather than *all* evicted persons as it is currently drafted.

2) Leases which allow evictions for criminal acts need to reflect the limits that Federal HUD has already placed upon these complexes and their residents via statute and regulation. Criminal acts for which one can be evicted are limited to those on or near the complex, with the exception, in some instances, that *drug and violent* crimes for which one can be evicted may encompass a broader geographic area.

3) The eviction process is set by Florida Statutes and Rules of Procedure set by the Florida Supreme Court. It is already the fastest legal proceeding in the civil court system. I would suggest that it cannot be legally accelerated by the City.

4) A decal program might be implemented, but management and law enforcement must keep in mind that residents are allowed visitors and guests. There has to be some reasonable provision for allowing access to visitors whom the resident wants to see. It goes without saying that the resident is then responsible for the acts of their guest.

Thank you for the opportunity to make a few comments upon your proposals. I look forward to our continuing working relationship.

Donald B. Freeman
Managing Attorney
Jacksonville Area Legal Aid, Inc.

**Neighborhood Safety & Stability Subcommittee
Crime-Free Multi-Family Housing Work Group
Recommendations**

Preface

The Work Group undertook the task of providing recommendations for reducing crime and improving general safety in multi-family housing communities. The group operated under the premise that there is much that can be done on many levels by: the owners/managers, the residents themselves, the police and government.

The recommendations listed represent the work of the group over three meetings. The group was supported by knowledgeable resource people from JSO, HUD and the city's Housing & Neighborhoods Department.

The strength of these recommendations lies in their voluntary, self-help nature, their ease of implementation and their cost effectiveness. Only a few recommendations call for additional allocation of city revenue. These methods are tried and validated to be successful and would serve to reduce crime in the impacted neighborhoods almost immediately. The JSO Crime-Free Multi-Family Housing program alone would take us a long way toward our goal. This program serves as the centerpiece for our recommendations.

The weakness of these recommendations lies, too, in their voluntary, self-help nature. They take commitment and a strong change in management attitude to bring about success. Therein lies the problem. These methods are not new but have not been widely applied voluntarily, especially in impacted areas. Other than the momentum created by *The Jacksonville Journey*, there is no reason to feel that these methods will be enthusiastically embraced and consistently applied.

Understanding that many of these recommendations could potentially add expense to affordable properties that, by their very nature, might not have excess cash flow, we identified ways the city might provide incentives and matching grants to property owners that participate in the JSO program. In addition, we propose city legislation with some "teeth" that would strongly encourage complexes that have excessive police service calls and crime to participate in the JSO program.

Finally, recommendations calling for more complex measures of action will take additional time for the city's legal and other staff to fully craft. But this must be done if we as a city are to reach our intended objectives.

Recommendations to the city and HUD

- Support the JSO in the implementation of its Crime-Free Multi-Family Housing (CFMFH) program and encourage all apartment communities to participate in the effort.
- Develop incentives for property owners to implement Crime Prevention Through Environmental Design (CPTED) recommendations. Incentives would be available to property owners in high-crime areas who are certified participants in JSO's Crime Free Multi Family Housing program. Depending on the source of revenue, this program may be expanded throughout Jacksonville.
- Ask City Council to consider making resident services programs in properties located in high crime areas a priority for Public Service Grants, Community Development Block Grants or other City funds; Make a five year commitment for funding.
- Work with the court system and Legal Aid to have judges and attorneys understand the need for strong lease enforcement and the need to support property owners in maintaining crime-free environments. Furthermore, call for an accelerated eviction process through the court system to better serve as a deterrent for criminal behavior. JSO is currently working with judges to educate them on the Crime Free Multi Family Housing program.
- Encourage HUD to:
 - Require its subsidized properties to participate in the JSO's Crime Free Multi-Family Housing program
 - Stay in closer touch with its property managers
 - Request that HUD be notified of all criminal acts on their properties
 - Encourage or require properties to take advantage of HUD's
 - Neighborhood Network Coordinator program

Potential city legislative action

- Review the existing property safety code to ensure inclusion of CPTED & HUD housing quality standards within the existing inspection framework
- Adopt a monetary penalty system based on the cost of responding to calls for complexes with excessive calls for JSO service, which includes an option for the owner in lieu of paying the fine to actively participate and become certified with the JSO CFMFH program.

Recommendations to property owners:

- Become certified in the JSO Crime-Free Multi-Family Housing Program
- Implement Crime Prevention Through Environmental Design (CPTED) strategies
 - Place sign on (HUD) properties in visible entry area listing a number to call to voice concerns or complaints
 - Erect a clear and accurate site map at entry way
 - Enhance lighting
 - Place locks on all doors and windows
 - Ensure clear and legible street signs and apartment numbers
 - Install useful peepholes (ie: wide view, accessible by people with disabilities)
 - Register cars and issue parking decals for all residents
 - Improve attractiveness and cleanliness

- Property Management
 - Develop and enforce leases that prohibit criminal acts by leaseholders and make leaseholders responsible for their guests. The lease standards must be strict and uniformly enforced.
 - Participate in a citywide database showing the names and driver's license numbers of all persons evicted for violent crimes or drugs in order to prevent these residents from moving into another development. The JSO is working with a private party to take ownership of the database. Furthermore, property owners/managers should network regularly w/ adjoining communities to identify evictions.
 - Offer diversity training for property owners/managers

- Resident Services
 - Develop resident organizations in all properties in high-crime areas
Owners and managers should meet regularly with the resident organization and JSO to discuss crime, maintenance, services and other issues.
 - Provide financial support so that resident organizations can conduct their business where possible. (For example, the Jacksonville Housing Authority provides \$25 per unit for stamps, phone, supplies, etc.).
Encourage resident organizations to participate with other area community organizations such as CPACs and SHADCOs
 - Space should be provided by property owners/managers where possible for resident organizations and their activities.
 - A Neighborhood Watch program should be a basic component of all resident organizations.
 - Provide social service programs or partner with health, education, social services or faith based programs to enable residents to improve skills and transition to higher levels of housing. Where possible, space should be made available for these services to take place.

Recommendations to Jacksonville Sheriff's Office

- Provide more frequent policing in high-crime developments
- Ask officers to knock on doors and get to know as many residents as possible, with the knowledge and concurrence of property owners, managers
- Encourage police personnel to attend resident organization meetings and discuss crime information
- Provide statistics to property managers/owners about calls for service and crime on property and within the neighborhood (perhaps through the Crime Free MFH Program website that is being contemplated.)

City recommendations:

- Enact legislation to impose a civil penalty or user fee on owners of apartment complexes with calls for police services over a threshold amount, similar to Section 168.104, Ordinance Code, concerning false burglary or robbery alarms. The penalty or fee would be waived for owners of complexes actively participating in the Crime-Free Multi-Family Housing Program. Owners cited for excessive calls for police services could elect to participate in the Crime-Free Multi-Family Housing Program in lieu of paying the penalty or fee established by this legislation, similar to the option in Section 603.302 for parents to attend parenting classes in lieu of paying a fine for children's curfew violations.