

**Will County Illinois
Neighborhood Stabilization Program
Substantial Amendment
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**Will County Illinois
Substantial Amendment to the
2008 Action Plan**

Jurisdiction: Will County Illinois

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Will County is hereby submitting its Substantial Amendment to the 2008 Action Plan for the purpose of fulfilling the application requirements to receive Neighborhood Stabilization Program Funds (NSP) from the United States Department of Housing and Urban Development (HUD). NSP Funds are authorized under Title III of the Housing and Economic Recovery Act of 2008 (HERA) and are to be treated as a component of the Community Development Block Grant Program (CDBG). By submitting a properly completed and approved Substantial Amendment on or before December 1, 2008 the County will be eligible for receiving \$5,160,424 in NSP funds to be used for the purpose of stabilizing neighborhoods that have been negatively impacted by the foreclosure crisis. Among the eligible activities under NSP, Will County intends to acquire foreclosed upon properties and redevelop as needed in order to place back on the market. The County also intends to acquire vacant and or otherwise blighted properties and redevelop as needed in order to place back on the market or otherwise make available for development of affordable housing in neighborhoods showing a decline resulting from the foreclosure crisis. Will County may also enter into agreements with the State of Illinois, also receiving NSP funds, if it can be established that by combining NSP funds from the State and County will expand the opportunity to stabilize more neighborhoods that have been negatively impacted by the foreclosure crisis.

A. Areas of Greatest Need

Will County has a long history of working with community groups such as: Habitat for Humanity, Cornerstone, Trinity, Lamb's Fold, and the Joliet Housing Authority to make affordable housing available within the county. Working with these partnerships over the last two decades, the Community Development Team within Will County has developed both new housing and rehabilitated existing housing stock for low and moderate income individuals and

families utilizing resources from the CDBG and Home Grant programs. Will County Community Development is also in the second year of providing a Lead Stabilization program for residents within the Will County geographic area.

NSP funds, however, must go to the geographic areas of greatest need, which have been identified by cross-referencing data detailing foreclosure and pre-foreclosure activity with HUD’s foreclosure and abandonment risk score data. The following census tracts have been identified as current areas of greatest need; however, Will County reserves the right to identify additional areas of greatest need and to remove areas from this list as shifts in foreclosure data are documented by HUD and/or Will County. Will County also reserves the right to fund the purchase of blighted and/or foreclosed and abandoned properties located outside the following census tracts. Such actions will not be considered a Substantial Amendment to the Action Plan and will proceed in accordance with Will County’s Citizen Participation guidelines and procedures.

Township	City/Village Unincorporated	Census Tract	BlockGroup	RiskFactor	#Persons	Foreclosure Rate	Predicted Foreclosures	% Subprime Mortgages
Monee	University Park	883604	1	10	3,765	10.3%	10.3%	58.3%
Joliet	Joliet/U	881200	3	10	608	10.0%	9.4%	53.1%
Joliet	Joliet/U	883100	1-3	10	2,004	9.4%	9.3%	52.1%
Joliet	Joliet/U	883000	1	10	1,604	9.3%	9.0%	50.3%
Joliet	Joliet/U	882300	1,2	10	1,478	8.2%	8.0%	44.4%
Joliet	Joliet/U	882200	2,4,5	10	678	7.8%	7.6%	41.7%
Joliet	Rockdale	882900	1,2	10	674	7.7%	7.6%	41.8%
Crete	Crete	883807	1	9	899	9.2%	9.2%	51.8%
Crete	Crete/U	883807	2	9	1,656	9.2%	9.2%	51.8%
Monee	University Park	883807	4	9	2,335	9.2%	9.2%	51.8%
Crete	Crete/U	883803	2	9	832	7.6%	7.5%	41.1%
Crete	Crete	883804	1	9	684	7.2%	7.1%	38.7%
Joliet	Crest Hill	881600	1	8	749	7.8%	7.2%	39.2%
Crete	Crete	883805	4,5	8	917	7.6%	7.6%	41.9%
Du Page	Romeoville	880202	1-3	8	1,690	7.3%	7.3%	39.8%
Lockport	Crest Hill	880900	1-4	8	3,574	5.6%	5.6%	29.3%
Wilmington	Wilmington/U	883400	1	8	727	5.5%	5.5%	28.8%
Wilmington	Wilmington	883400	2-6	8	861	5.5%	5.5%	28.8%
Du Page	Romeoville	880201	1-5	7	715	6.6%	6.6%	35.5%
Du Page	Romeoville/U	880201	5	7	1,100	6.6%	6.6%	35.5%
Lockport	Romeoville	880501	1-4	7	1,918	6.5%	6.5%	35.2%
Lockport	Romeoville/U	880501	1,5	7	3,743	6.5%	6.5%	35.2%
Reed	Braidwood	884001	1-3	7	1,974	6.2%	6.2%	33.1%

Reed	Godley	884001	2	7	535	6.2%	6.2%	33.1%
Plainfield	Crest Hill/U	880406	1,2,4	7	581	6.2%	5.8%	30.9%
Plainfield	Crest Hill	880406	3	7	1,052	6.2%	5.8%	30.9%
Troy	Unincorporated	883205	3	7	518	6.1%	5.6%	29.6%
Lockport	Lockport	880502	1	7	603	5.3%	5.3%	27.5%
Lockport	Lockport/U	880502	1-3	7	676	5.3%	5.3%	27.5%
Lockport	Lockport	880700	1,4	7	2,081	5.1%	5.1%	26.1%
Lockport	Lockport/U	880700	2-4	7	612	5.1%	5.1%	26.1%

B. Distribution of NSP Funds

Section 2301(c)(2) of HERA requires that funds be distributed to the areas of greatest need based on the three stipulated need categories: Areas with greatest percentage of home foreclosures, highest percentage of subprime mortgages, and areas likely to face a significant rise in home foreclosures over the next 18 months. In order to focus on the areas of greatest need that meet the spirit of this program and where the impact would be the greatest, we selected only census tracts that met the following criteria: Areas flagged as Low Moderate and Middle Income Eligible, An Estimated Foreclosure Abandonment Risk Score of 7 or higher, and Total Persons in a particular census tract of greater than 500.

1) Areas with greatest percentage of home foreclosures:

As listed in the table above and coupled with the criteria for overall greatest need areas listed above, Will County has identified the areas of greatest percentage of home foreclosures by selecting tracts that had current foreclosure rates of greater than 5%. Purchasing, rehabbing, re-selling, and renting homes in these areas will be the highest priority use of the NSP funds.

2. Areas with the highest percentage of homes financed by a subprime mortgage:

As listed in the table above and coupled with the criteria for overall greatest need areas listed above, Will County has selected the areas with a rate of subprime mortgages greater than 25% of all the mortgages written in that census tract. Since all these census tracts are included in the areas of greatest need identified above, purchasing, rehabbing, reselling, and renting homes in these areas will be the highest priority use of the NSP funds.

3. Areas likely to face a significant rise in the rate of home foreclosures:

As listed in the table above and coupled with the criteria for overall greatest need areas listed above, Will County has identified the areas where the greatest potential of home foreclosures may occur by selecting tracts that had a Predicted 18 Month Underlying Problem Foreclosure Rate of greater than 5%. Since the NSP funds may not be used for foreclosure prevention, nor can houses be purchased with NSP funding until a foreclosure occurs, Will County will monitor these areas for continued foreclosure activity. Purchasing, rehabbing, re-selling, and renting homes in these areas will be the second highest priority use of the NSP funds.

C. Definitions and Descriptions

1. The Substantial Amendment defines “blighted structure” to mean a structure that (a) is abandoned; (b) meets the definition of “Unsafe Structure” under the 2006 International Property Maintenance Code, as adopted by Will County which is: “Any building or structure found to be dangerous to the life, health, property or safety of the public or the occupants of the structure by providing minimum safeguards to protect or warn occupants in the event of fire, or because such structure contains unsafe equipment or is so damaged, decayed, dilapidated, structurally unsafe or of such faulty construction or unstable foundation, that partial or complete collapse is possible, and (c) is not able to be restored to a safe condition.”

2. “Affordable rents” shall mean the Maximum Allowable High HOME Rents as published by HUD from time to time. These rents also include utilities. If the tenant pays utilities, a utility allowance must be subtracted from the maximum allowable rent to determine the maximum contract rent. Utility allowances will be calculated according to current Will County HOME Program guidelines.

3. “Continued affordability” shall be in accordance with the HOME program standards at 24 CFR 92.252(a), (c), (e), and (f) for rental properties and 24 CFR 92.254 for home ownership housing. On going monitoring of rental properties will follow HOME guidelines based on the number of units being used for rental and the term of the affordability period. With respect to property sales within the affordability period, we will use the recapture method for repayment of NSP funds used for subsidies or loaned within the period of affordability defined by the HOME Program standards listed above. Should a property be re-sold or refinanced within the affordability period on or before July 30, 2013, the County will require repayment of 100% of NSP related funds with the intent to recast this program income into additional home or rental properties using the NSP program. Recapture of the funds will then mark the end of the affordability period for that property. If a property is re-sold or refinanced after July 30, 2013, the County will require repayment of NSP related funds in a prorated fashion based on the number of months into and remaining in the affordability period. All related program income will be returned to the appropriate entities based on direction from HUD per NSP regulations.

4. “Housing rehabilitation standards” shall at a minimum meet current County and Local building codes and as amended from time to time. These standards require that all buildings purchased for rehabilitation be brought up to local code, that required building permits be obtained, and that appropriate inspections be performed.

D. Low Income Targeting

The estimated amount of funds appropriated or otherwise made available under the NSP to 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 percent of area median income is \$1,300,000. This number represents 25% of the Will County NSP allocation. Additionally, 25% of NSP program income will be made available for households at less than 50 percent area median income.

E. Acquisitions and Relocation

Will County does not intend to demolish or convert any low- and moderate-income dwelling units. However, should it become necessary to undertake demolition and/or conversion, Will County is providing the following required information:

- (a) Number of low-and moderate-income dwelling units reasonably expected to be demolished or converted as a direct result of NSP-assisted activities: One (1) per year for a total of four (4) over the life of the program.
- (b) The number of NSP affordable housing units that will be made available: Fifteen (15) units will be produced under the NSP Homebuyer Program Activity between February, 2009 and July, 2010 and will be for households at less than 120% AMI.
- (c) The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income: Seven (7) units will be produced under the NSP Rental Program Activity between February, 2009 and July, 2010.

With respect to determining the appropriate valuation of a property prior to acquisition so as to determine the discounted value at which we can purchase, Will County will procure an appraisal by a certified Appraiser prior to closing. Homes must be purchased for a minimum of 5% less than the current market appraised value. Because appraising homes is becoming increasingly difficult due to the number of foreclosed properties on the market and the falling value of comparable listing, Will County reserves the right to adopt an alternate method of establishing value, should a new methodology be approved by HUD.

F. Citizen Participation/Public Comment

Citizen Participation

In order to expedite the grant-making process, HUD permitted a citizen participation alternative requirement comprised of the following steps:

- The proposed action plan amendment is to be published via the usual methods and on the Internet for no less than 15 calendar days of public comment;
- Final action plan amendment must be posted on the Internet and submitted to HUD by December 1, 2008. The grant application includes Standard Form 424 (SF-424) and certifications.

The following activities were carried out to promote citizen participation:

- Ron Pullman, Director of Community Development for Will County, met with the County Advisory Board on Monday, October 20th to discuss the NSP Grant and potential implementations.
- A Public Notice was printed in the Herald News and posted on the Will County Website <http://www.willcountylanduse.com/> on Thursday, October 30, 2008. The notice

described the Proposed Substantial Amendment, resources available, and contact person for further information.

- The Public Notice was broadcast electronically to all of the members of the Continuum.
- A copy of the Proposed Substantial Amendment will be made available to the public via the Will County Website <http://www.willcountylanduse.com/> and also broadcast to the Continuum Agencies on November 5, 2008.
- The date/location (November 10, 2008 at the Will County Office Building) for the Public Hearing concerning the contents of the Substantial Amendment and proposed execution of the plan described in it was also established in the Public Notice. A copy of the notice is included in **Appendix A**.
- A resolution authorizing the submittal of the Proposed Substantial Amendment will be placed on the agenda of the November 20, 2008 meeting of the County Board for approval.

Public Comment

Following is a summary of public comments received to the proposed NSP Substantial Amendment: See Appendix C.

G. Working with Other NSP Jurisdictions

Within the areas of greatest need as per attached Census Tract Table, the County may work with other jurisdictions such as the City of Joliet, that contain clusters of foreclosed upon properties that are included in each other's "targeted areas of greatest need" and are considered to be the same neighborhood. Examples such as the Ridgewood, Manningdale, Fairmont and Forest Park neighborhoods may contain properties in each respective jurisdiction. The County will consider working with the City of Joliet to achieve maximum impact on neighborhood stabilization.

It is also the intent of the County to make application to the State of Illinois for an allocation of the State's NSP allocation. Such funds, if received, shall be used in the County's area of greatest need in order to maximize impact on neighborhood stabilization. While we reserve the right to make such application to the State, the attached budget does not reflect receipt or expenditure of such State NSP funds. Furthermore, receipt and use of such State NSP funds would not constitute a substantial amendment to this Plan.

H. NSP Information by Activity

Will County proposes to use the NSP funds in the following manner; however, Will County reserves the right to shift funding from one activity to another and from one agency to another, as additional areas of greatest needs are identified, and according to availability of suitable properties, agency capacity, project readiness, and ability to meet the timeliness requirements of the NSP. Such shifting of funds from one activity to another shall not be considered a Substantial Amendment to the Action Plan. Notwithstanding the foregoing, under all circumstances a minimum of 25% of NSP funds will be used for housing individuals and families whose incomes do not exceed 50 percent of area median income. A budget summary for the activities is listed in **Appendix B**. Detailed Activity Sheets can be found on the following pages.

Activity #1								
(1) Activity Name: NSP Rental Program								
(2) Activity Type: NSP (B) – Purchase, rehab, rental of foreclosed properties CDBG – 24 CFR 570.201(a) Acquisition; 24 CFR 570.202 Eligible rehabilitation and preservation activities								
(3) National Objective: 24 CFR 570.208(a)(2) Limited clientele activity benefiting low income Persons at 50% area median income for the given census tract								
(4) Projected Start Date: March, 2009								
(5) Projected End Date: July, 2010; however, homes to remain housing for households at less than 50% AMI for a minimum of 15 years as required by HOME Affordability Requirements.								
(6) Responsible Organization: Will County Land Use Department – Community Development Division, 58 E. Clinton Street Suite 500, Joliet, IL 60432, 815-774-7895, Tim Mack NSP Program Manager; additional organizations with demonstrated capacity to carry out this activity and may participate in this program are as follows: Trinity/Lamb’s Fold, Cornerstone, Morning Star Mission, Daybreak Catholic Charities, Will County Drug Court, Housing Authority of Joliet, and Habitat for Humanity. (Additional organizations with demonstrated capacity to carry out this activity may be added at the discretion of Will County and such additions shall not be considered a Substantial Amendment to the Action Plan)								
(7) Location Description: The following census tracts have been identified as potential starting areas for purchase, rehab, and renting of foreclosed properties meeting the low income housing requirement for those below 50% AMI: 8812.00 Block 3; 8822.00 Blocks 2,4,5; and 8823.00 Blocks 1,2. Other census tracts with equal need will be selected and identified over the course of the program as funds are made available.								
(8) Activity Description: This activity will address neighborhood stabilization in five to seven census tracts listed above through purchase, rehab, and renting of foreclosed properties Purchase of specific foreclosed properties will be dependent on highest degree of neighborhood need and availability of foreclosed, moderately priced properties. Funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income. The tenure of the beneficiaries for this activity will be rental. The property owner (landlord) will certify the property remains affordable for the term of the affordability period. The following affordability guidelines will apply to properties purchased and rehabilitated for purpose of rental activities undertaken by NSP funding: <table border="1"> <thead> <tr> <th>Average Per-Unit NSP \$</th> <th>Minimum Affordability Period</th> </tr> </thead> <tbody> <tr> <td><\$15,000/unit</td> <td>5 years</td> </tr> <tr> <td>\$15,000-\$40,000/unit</td> <td>10 years</td> </tr> <tr> <td>>\$40,000 unit</td> <td>15 years</td> </tr> </tbody> </table> New Construction of rental units or acquisition of new units will have a minimum affordability period of 20 years for any amount of NSP funds used on such project. Will County will partner with the organizations listed in (6) above to select properties in the prescribed areas that help meet the needs of individuals/families meeting the income requirements established for this activity. Disposition of these properties to partner organizations may include outright sale to or an equity sharing agreement. Program Income obtained from disposition under any arrangement may be used to expand the scope of this activity and grow the number of Rental Units to be available to individuals/families meeting the 50% AMI requirement.	Average Per-Unit NSP \$	Minimum Affordability Period	<\$15,000/unit	5 years	\$15,000-\$40,000/unit	10 years	>\$40,000 unit	15 years
Average Per-Unit NSP \$	Minimum Affordability Period							
<\$15,000/unit	5 years							
\$15,000-\$40,000/unit	10 years							
>\$40,000 unit	15 years							

HOME guidelines for monitoring will be employed and monitored by the NSP Program Manager for Will County and based on the number of units with the frequency of inspection as follows:

<u>Number of Units</u>	<u>Frequency</u>
1-4	every 3 years
5-25	every 2 years
greater than 25	annually

All properties acquired under this activity must meet the required purchase discount of at least 5% less than current market appraised value, and must be as high as required to keep the total NSP portfolio within the required purchase discount level. As program income is received from NSP activities, neighborhood stabilization through rental activity may be expanded to additional census tracts as funds permit.

(9) Total Budget: \$1,300,000 public NSP funds;(this budget includes purchase of home, closing costs, rehabilitation costs, carrying costs, project delivery costs directly attributable to a specific address)

(10) Performance Measures: 7 units of housing to be acquired, rehabilitated, and rented to households that are below 50% of median family income

Activity #2								
(1) Activity Name: NSP Homebuyer Program								
(2) Activity Type: NSP (A) – Development of financing mechanisms and NSP (B) – Purchase, rehab, sale of foreclosed properties; CDBG – 24 CFR 570.201(a) Acquisition; 24 CFR 570.202 Rehabilitation; 24 CFR 570.2012(n) Direct Homeownership Assistance; 24 CFR 570.201(b) Disposition								
(3) National Objective: 24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% of area median income permitted under NSP)								
(4) Projected Start Date: March, 2009								
(5) Projected End Date: July, 2010 (originally allocated funds committed to specific addresses); activity will continue with program income								
(6) Responsible Organization: Will County Land Use Department – Community Development Division, 58 E. Clinton Street Suite 500, Joliet, IL 60432, 815-774-7895, Tim Mack NSP Program Manager. (Additional organizations with demonstrated capacity to carry out this activity may be added at the discretion of Will County and such additions shall not be considered a Substantial Amendment to the Action Plan)								
(7) Location Description: The following census tracts have been identified as potential starting areas for purchase, rehab, and sale of foreclosed properties meeting the low-middle income housing requirement for those at 50-120% AMI: 8812.00 Block 3; 8822.00 Blocks 2,4,5; 8823.00 Blocks 1,2; 8807.00 Blocks 1,4; 8816.00 Block 1; 8809.00 Blocks 1-4; 8838.07 Blocks 1,4; 8802.01 Blocks 1-5; 8802.01(U) Block 5; 8802.02 Blocks 1-3; 8805.01 Blocks 1-4; 8805.01(U) Blocks 1,5; 8836.04 Block 1; 8829.00 Blocks 1-2. Other census tracts with equal need will be selected and identified over the course of the program as funds are made available.								
(8) Activity Description: This activity will address neighborhood stabilization in three to five census tracts listed above through purchase, rehab, and re-sale of foreclosed properties. The specific neighborhoods within the census tracts will be identified at the time the NSP funds are available for drawdown and as the program progresses. Purchase of specific foreclosed properties will be dependent on highest degree of neighborhood need and availability of foreclosed, moderately priced properties. The tenure of the beneficiaries will be the home owner. In order to meet the objective of homeownership, Will County may offer potential homebuyers several options to achieve that goal including: lease with option to buy in a specified time frame; outright purchase with the potential for down payment and closing cost assistance in the form of a 0% interest payment deferred loans, or a shared equity agreement. The term of assistance for any arrangement, will be until the homebuyer sells the home or the home is no longer the homebuyer’s principal residence. Such deferred, soft second loans will be considered a financing mechanism under NSP (A) and, as such, funds received by Will County in repayment of such loans may be retained by Will County and treated as CDBG funds to be used in accordance with Section 2301 of HERA. The period of affordability for each home will be based on current HOME guidelines as follows:								
<table border="0"> <thead> <tr> <th><u>NSP Funds provided</u></th> <th><u>Minimum Affordability Period</u></th> </tr> </thead> <tbody> <tr> <td>Less than \$15,000</td> <td>5 years</td> </tr> <tr> <td>\$15,000-\$40,000</td> <td>10 years</td> </tr> <tr> <td>Greater than \$40,000</td> <td>15 years</td> </tr> </tbody> </table>	<u>NSP Funds provided</u>	<u>Minimum Affordability Period</u>	Less than \$15,000	5 years	\$15,000-\$40,000	10 years	Greater than \$40,000	15 years
<u>NSP Funds provided</u>	<u>Minimum Affordability Period</u>							
Less than \$15,000	5 years							
\$15,000-\$40,000	10 years							
Greater than \$40,000	15 years							
Affordability will be enforced through deed restriction, shared equity agreements, or land trust models.								
All homes under this activity will use the HOME program method of recapture. Recapture (see section C.3. above) will be triggered through placing a mortgage on the property. All properties acquired under this activity must meet the required purchase discount of at least 5% less than current market appraised value, and must be as high as required to keep the total NSP portfolio within the required purchase discount level. As program income is received, neighborhood stabilization through homebuyer activity								

may be expanded to additional census tracts as funds permit. If a home acquired through this homebuyer activity is not able to be sold to a homebuyer within a reasonable period of time, as determined in the sole discretion of Will County, such home may be temporarily rented to a household at less than 120% AMI and sold at a later date or leased with option to buy to an income qualified household.

(9) Total Budget: \$2,979,424 public NSP funds; (this budget includes purchase of home, closing costs, rehabilitation costs, carrying costs, project delivery costs directly attributable to a specific address for between 15 and 16 units at an average cost of \$187,500)

(10) Performance Measures: 15-16 units of housing to be acquired, rehabilitated, and sold to eligible households that are below 120% of median family income.

Activity #3
(1) Activity Name: Homebuyer Counseling
(2) Activity Type: NSP (B) Purchase, rehab, and re-sell foreclosed properties (homebuyer counseling is required); CDBG – 24 CFR 570.201(e) Public services for housing counseling
(3) 24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% of MFI permitted under NSP)
(4) Projected Start Date: April, 2009 (begin building pipeline of qualified potential homebuyers)
(5) Projected End Date: July, 2010 (originally allocated funds committed to specific addresses); activity will continue with program income until July 30, 2013
(6) Responsible Organization: Will County Land Use Department – Community Development Division, 58 E. Clinton Street Suite 500, Joliet, IL 60432, 815-774-7895, Tim Mack NSP Program Manager. (Additional organizations with demonstrated capacity to carry out this activity may be added at the discretion of Will County and such additions shall not be considered a Substantial Amendment to the Action Plan)
(7) Location Description: Census tracts identified above; other census tracts with equal need, as they are identified over the course of the program.
(8) Activity Description: This activity will provide the homebuyer counseling required under the NSP. Counseling services may include, but are not limited to, eight required hours of counseling, individual financial literacy assistance, individual case management, and follow-up.
(9) Total Budget: \$ 40,000 public NSP funds; Budget includes offering counseling services to 100 clients who are prospective tenants or homebuyers of the NSP properties over a five year period to produce 15-22 qualified buyers. (Additional funds may be transferred to this activity from Activity 4 “Administration” as needed).
(10) Performance Measures: 100% of homebuyers under the NSP program must complete at least eight (8) hours of homebuyer counseling.

Activity #4
(1) Activity Name: Administration
(2) Activity Type: NSP allows 10% of initial allocation, and 10% of program income, to be used for general administration and planning activities (Federal Register, Vol. 73, No. 194, II. H.) CDBG – 24 CFR 570.205 and 24 CFR 570.206
(3) To administer activities that benefit low and moderate income persons under 24 CFR 570.208(a)(2) and potentially under 24 CFR 570.208(a)(1) (up to 120% of AMI permitted under NSP)
(4) Projected Start Date: October, 2008 (Federal Register, Vol. 73, No. 194, II. C. allows reimbursement for pre-award costs)
(5) Projected End Date: July 30, 2013; however, monitoring of projects and receipt of program income through recapture will continue indefinitely
(6) Responsible Organization: Will County Land Use Department – Community Development Division, 58 E. Clinton Street Suite 500, Joliet, IL 60432, 815-774-7895, Tim Mack NSP Program Manager. (Additional organizations with demonstrated capacity to carry out this activity may be added at the discretion of Will County and such additions shall not be considered a Substantial Amendment to the Action Plan)
(7) Location Description: Census tracts identified above; other census tracts with equal need, as they are identified over the course of the program.
(8) Activity Description: This activity will provide the general administration and planning activities required to receive NSP funding and implement a successful NSP program.
(9) Total Budget: \$516,000 public NSP funds over the five year program period, beginning with pre-award activities as of September 29, 2008. General Management, Oversight, and Coordination costs will be applied as follows for Will County staff administering the NSP program: Tim Mack – NSP Program Manager 60% of annual salary, Ron Pullman - Will County Land Use Director of Community Development 10% of annual salary, Elizabeth Dunn – NSP Environmental Manager 15% of annual salary, Michelle Allen – NSP Home Monitoring Manager – 15% of annual salary. Will County reserves the right to modify the existing program administration structure as needed to successfully deliver on the objectives of this program. Current expected administration costs for the life of the program from October 1, 2008 through July 30, 2013 expected to reach \$350,000 but not to exceed \$516,000. Will County reserves the right to use outside agencies to administer portions of this program which would utilize Administration funds not to exceed \$516,000. Should this activity not require the allowed amount of administration funds, these funds may be re-assigned to any of the above activities and such re-assignment shall not be considered a Substantial Amendment to the Action Plan.
(10) Performance Measures: Will County will complete necessary planning activities to receive NSP funds; 100% of NSP funds will be accurately administered; NSP Activities 1, 2, 3, 5 and 6 will be completed.

Activity #5
(1) Activity Name: NSP Land Bank
(2) Activity Type: NSP (C) – Establish land banks for homes that have been foreclosed upon; CDBG – 24 CFR 570.201(a) Acquisition; 24 CFR 570.201(b) Disposition
(3) To administer activities that benefit low and moderate income persons under 24 CFR 570.208(a)(2) and potentially under 24 CFR 570.208(a)(1) (up to 120% of AMI permitted under NSP)
(4) Projected Start Date: March 2009
(5) Projected End Date: July 30, 2010
(6) Responsible Organization: Will County Land Use Department – Community Development Division, 58 E. Clinton Street Suite 500, Joliet, IL 60432, 815-774-7895, Tim Mack NSP Program Manager. (Additional organizations with demonstrated capacity to carry out this activity may be added at the discretion of Will County and such additions shall not be considered a Substantial Amendment to the Action Plan)
(7) Location Description: Census tracts identified above; other census tracts with equal need, as they are identified over the course of the program.
(8) Activity Description: This activity will allow the establishment of land banks for homes that have been foreclosed upon. The specific neighborhoods within the census tracts will be identified at the time the NSP funds are available for drawdown and as the program progresses. Properties acquired for land banking purposes will then become part of Activity 1, NSP Rental Program, Activity 2-NSP-Homebuyer Program, or Activity 6 – NSP Demolition and Redevelopment Program.
(9) Total Budget: \$0 public NSP funds. Leveraging to be determined. If it is determined that establishment of a land bank would be a beneficial use of NSP funds, NSP funds will be transferred to this activity from another activity, such re-assignment shall not be considered a Substantial Amendment to the Action Plan.
(10) Performance Measures: Performance measures will be determined when and if this activity is funded.

Activity #6
(1) Activity Name: NSP Demolition and Redevelopment Program
(2) Activity Type: NSP (D) Demolish blighted structures and NSP (E) Redevelop demolished or vacant properties; CDBG – 24 CFR 570.201(a) Acquisition; 24 CFR 570.201(b) Disposition; 24CFR 570.201(d) Clearance for blighted structures only; 24 CFR 570.201(c) public facilities and improvements
(3) National Objective: 24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% of MFI permitted under NSP); there is potential for area wide benefit under 24 CFR 570.208(a)(1) at the discretion of HUD
(4) Projected Start Date: March 2009
(5) Projected End Date: July 30, 2010
(6) Responsible Organization: Will County Land Use Department – Community Development Division, 58 E. Clinton Street Suite 500, Joliet, IL 60432, 815-774-7895, Tim Mack NSP Program Manager. (Additional organizations with demonstrated capacity to carry out this activity may be added at the discretion of Will County and such additions shall not be considered a Substantial Amendment to the Action Plan)
(7) Location Description: The following census tracts have been identified as potential starting areas for demolition and redevelopment of foreclosed properties meeting the low-middle income housing requirement for those at 50-120% AMI: 8812.00 Block 3; 8822.00 Blocks 2,4,5; 8823.00 Blocks 1,2; 8807.00 Blocks 1,4; 8816.00 Block 1; 8809.00 Blocks 1-4; 8838.07 Blocks 1,4; 8802.01 Blocks 1-5; 8802.01(U) Block 5; 8802.02 Blocks 1-3; 8805.01 Blocks 1-4; 8805.01(U) Blocks 1,5; 8836.04 Block 1; 8829.00 Blocks 1-2. Other census tracts with equal need will be selected and identified over the course of the program as funds are made available.
(8) Activity Description: This activity will allow the demolition of blighted structures and redevelopment of demolished or vacant properties. The specific neighborhoods within the census tracts will be identified at the time the NSP funds are available for drawdown and as the program progresses. Properties under this activity may be redeveloped with housing that will then become part of Activity 1, NSP Rental Program or Activity 2-NSP-Homebuyer Program, or, if allowed by HUD, be redeveloped with public facilities to serve either a limited clientele or low to moderate income persons on an area wide basis.
(9) Total Budget: \$100,000 public NSP funds. Leveraging to be determined. If it is determined that demolition and/or redevelopment would be a beneficial use of additional NSP funds, NSP funds will be transferred to this activity from another activity. Such re-assignment of funds shall not be considered a Substantial Amendment to the Action Plan.
(10) Performance Measures: Number of low-and moderate-income dwelling units reasonably expected to be demolished or converted as a direct result of NSP-assisted activities: One (1) per year for a total of four (4) over the life of the program.

Activity #7
(1) Activity Name: NSP Financing Mechanisms for Purchase and Redevelopment
(2) Activity Type: NSP (A) – Development of financing mechanisms and NSP (B) – Purchase of foreclosed properties; CDBG – 24 CFR 570.201(a) Acquisition; 24 CFR 570.202 Rehabilitation; 24 CFR 570.2012(n) Direct Homeownership Assistance
(3) National Objective: 24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% of AMI permitted under NSP)
(4) Projected Start Date: March 2009
(5) Projected End Date: July 30, 2010
(6) Responsible Organization: Will County Land Use Department – Community Development Division, 58 E. Clinton Street Suite 500, Joliet, IL 60432, 815-774-7895, Tim Mack NSP Program Manager. (Additional organizations with demonstrated capacity to carry out this activity may be added at the discretion of Will County and such additions shall not be considered a Substantial Amendment to the Action Plan)
(7) Location Description: Census tracts identified above; other census tracts with equal need, as they are identified over the course of the program.
(8) Activity Description: This activity will address neighborhood stabilization in one to five census tracts listed above through the establishment of financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-seconds, loan loss reserves, and shared-equity loans for low- and moderate-income homebuyers. The specific neighborhoods within the census tracts will be identified at the time the NSP funds are available for drawdown and as the program progresses. Purchase of specific foreclosed properties will be dependent on highest degree of neighborhood need and availability of foreclosed, moderately priced properties. The tenure of the beneficiaries will be home ownership. Will County will provide 0% interest, payment deferred loans to the homebuyer beneficiaries of this activity who may directly purchase foreclosed properties without title to such property passing through Will County or a sub-recipient agency of Will County. The term of assistance, therefore, will be until the homebuyer sells the home or the home is no longer the homebuyer’s principal residence. Funds received by Will County in repayment of such loans may be retained by Will County and treated as CDBG funds to be used in accordance with Section 2301 of HERA. Affordability periods will use the HOME guidelines as specified in Activities 1 and 2 above. Affordability will be enforced through deed restriction, shared equity agreements, or land trust models. Home monitoring will be consistent with HOME guidelines specified in Activities 1 and 2 above. All homes under this activity will use the HOME program method of recapture as described in section C.3abovea will be triggered through placing a mortgage on the property. All properties acquired under this activity must meet the required purchase discount of at least 5% less than current market appraised value, and must be as high as required to keep the total NSP portfolio within the required purchase discount level. Minor rehab will be allowed in this activity.
(9) Total Budget \$225,000 public NSP funds for down payment and closing costs assistance. This will provide assistance of \$15,000 per unit for 15 units.
(10) Performance Measures: 15 units of housing to be purchased directly by eligible households that are below 120% of median family income

CERTIFICATIONS

(1) **Affirmatively furthering 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 ≤ 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.

Signature/Authorized Official

Date

Title

APPENDIX A

Will County, Illinois Substantial Amendment to the 2008 Annual Action Plan of The 2005-2009 Will County Consolidated Plan For Housing and Community Development Notice of Public Hearing And Notice of Public Display

Will County proposes to amend the above Action Plan and Consolidated Plan for the purpose of fulfilling the application requirements to receive Neighborhood Stabilization Program (NSP) funds from the U.S. Department of Housing and Urban Development (HUD) authorized under Title III of the Housing and Economic Recovery Act of 2008 (HERA)

HERA provides that these funds shall generally be treated as Community Development Block Grant (CDBG) funds. Making proper application to HUD by December 1, 2008, will result in Will County receiving an allocation of \$5,160,424.00 to be used for the purpose of acquiring and redeveloping foreclosed properties that might otherwise become sources of abandonment and blight within their communities.

Will County also anticipates receiving program income from undertaking NSP activities, in an amount yet to be determined, which will be used for additional NSP activities as allowed under HERA. Will County may also enter into intergovernmental or subrecipient agreements with the State of Illinois, also receiving NSP funds, if such collaboration would enhance the efforts of Will County within its own areas of greatest need, or if Will County determines it would be beneficial to participate in a regional land bank, should one be established.

Will County has initially identified the areas of greatest need based on data received from HUD and Will County data. The Substantial Amendment breaks these areas down between areas with greatest percentage of home foreclosures, areas with highest percentage of homes financed by a subprime mortgage related loan, and areas likely to face a significant rise in the rate of home foreclosures.

The NSP Program identifies five basic eligible activity groups including: (a) Establishing financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-second mortgages, loan-loss reserves, and shared-equity loans for low-and moderate-income homebuyers; (b) Purchasing and rehabilitating homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties; (c) Establishing land banks for homes that have been foreclosed upon; (d) Demolishing blighted structures; and (e) Redeveloping demolished or vacant properties. The Will County Substantial Amendment identifies specific program activities that it may carry out and the agencies that it may partner with in carrying out these activities during the next five-year period. Will County may shift funding between activities and add additional organizations to the list without further amendment to its Action Plan. Twenty-five percent (25%) of the Will County NSP allocation will be appropriated for housing individuals or families whose incomes do not exceed 50% of area median income.

A **Public Hearing** will be held to gain input on the Substantial Amendment as follows:

Monday, November 10, 2008

Time: 3:00 p.m.

Will County Office Building

Second Floor Board Room

302 N. Chicago Street

Joliet, Illinois 60432

The location of the public hearing is accessible to people with disabilities. Anyone requiring

accommodation related to a disability should contact the Community Development Division office at (815) 774-7890 by November 3, 2008.

The full text of the Substantial Amendment will be on display at the above location for a minimum of fifteen days (15) from November 5 through and including November 19th. The text may be viewed at www.willcountylanduse.com. A copy of this amendment and/or further information can also be obtained by contacting the NSP Contact Person by telephone or email. Any individual, group, or agency wishing to comment on this proposed Substantial Amendment may submit such comments in writing to be received by 4:30 p.m. on November 19, 2008 at the address shown above. The Substantial Amendment to Will County's 2008 Action Plan will be presented to the County Board for its adoption at the County Board meeting on November 20, 2008, to be held in the second floor board room at 302 N. Chicago Street, Joliet Illinois at 9:30 a.m.

NSP Contact Person: Tim Mack
Will County Land Use Department
Community Development Division
58 E. Clinton Street, Suite 500
Joliet, Illinois
Telephone: 815-774-7890
Fax: 815-774-7895

Email: tmack@willcountylanduse.com
Jurisdiction Web Address: www.willcountylanduse.com

Published: Herald News Joliet, October 30, 2008.

APPENDIX B

ACTIVITY BUDGET SUMMARY

Activity	Allocation	Performance Measure
NSP Rental Program	\$1,300,000	7 units of housing to be acquired, rehabilitated, and rented to households that are below 50% of median family income
NSP Homebuyer Program	\$2,979,424	15-16 units of housing to be acquired, rehabilitated, and sold to eligible households that are below 120% of median family income
Homebuyer Counseling	\$40,000	100% of homebuyers under the NSP program must complete at least eight (8) hours of homebuyer counseling
Administration	\$516,000	Will County will complete necessary planning activities to receive NSP funds; 100% of NSP funds will be accurately administered; NSP Activities 1, 2, 3, 5 and 6 will be completed
NSP Land Bank	\$0	If Land Banking is determined to be of benefit NSP Funds will be transferred from another activity. Performance measures will be determined when and if this activity is funded
NSP Demolition and Redevelopment Program	\$100,000	Number of low-and moderate-income dwelling units reasonably expected to be demolished or converted as a direct result of NSP-assisted activities: One (1) per year for a total of four (4) over the life of the program
NSP Financing Mechanisms for Purchase and Redevelopment	\$225,000	15 units of housing to be purchased directly by eligible households that are below 120% of median family income

APPENDIX C
NSP Public Hearing Notes
November 10, 2008

Tim Mack, NSP Program Manager presented PowerPoint presentation about NSP program.

Ron Pullman, Director of Community Development for Will County, spoke about the State of Illinois NSP plan. Both Ron and Alfredo Melessio (City of Joliet) asked agencies to review and respond to the State's plan due to the fact that they are proposing to only set aside 10% for current NSP recipients.

Bette Reed from Cornerstone asked about recycled funds and 18 month period to commit and 4 year expenditure period. Ron Pullman responded.

Steve Wilhelmi from Habitat for Humanity asked how the County is planning on financing and locating the individuals who would purchase properties. Ron spoke about pre-qualifying individuals prior to the actual purchase of property and rehab. Steve offered to share Habitats assistance since they already have a mechanism in place to prequalify clients. Steve also mentioned sweat equity.

Tim Mack spoke about the possibility of a lease/purchase program.

Deb Darzinskis asked if Will County has any specific properties in mind. Ron replied by stating no and explained the purchase and appraisal process.

Pam Kosteki commented about the lease to own idea and praised this proposal. She stated that she believed lenders were currently requiring 30% down payments for home purchases.

Michelle Allen (Will County Program Manager for HOME) discussed FirstHome.

Steve Wilhelmi asked about the termination period and what about the \$\$\$ after June 30, 2013. Tim responded and spoke about the possibility of continuing to recycle NSP funding.

Alfredo Melessio asked if the County would take an application for a non profit in the City Limits. It was then discussed by Ron, Tim and Alfredo that all requests in the City would be referred to the City and all requests in the County would be referred to the County.

Pam Kosteki inquired about NSP being used in Bolingbrook. Ron explained the allocation process by HUD and that Bolingbrook has the responsibility to apply to the State for funding.

No further questions were asked.

Appendix D

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): <u>Will County Illinois</u> Lead Agency Jurisdiction Web Address: <i>(URL where NSP Substantial Amendment materials are posted)</i>	NSP Contact Person: Tim Mack Address: 58 E. Clinton, Joliet, IL 60432 Telephone: 815-774-7892 Fax: 815-774-7895 Email: tmack@willcountylanduse.com
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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 2-4.

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 4.

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 5.

- a definition of “affordable rents,”
 Yes No . Verification found on page 5.

- a description of how the grantee will ensure continued affordability for NSP assisted housing,
Yes No . Verification found on page 5.
- a description of housing rehabilitation standards that will apply to NSP assisted activities?
Yes No . Verification found on page 5.

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 5.
- 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 5.
Amount budgeted = \$ 1,300,000.00.

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 6.

If so, does the substantial amendment include:

- The number of low- and moderate-income dwelling units—i.e., ≤ 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 6
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., ≤ 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 6.
- 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 6.

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 6 - 7.

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

Yes No Verification found on page Appendix C.

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 8- 16.
- correlated eligible activity under CDBG,
Yes No Verification found on page 8- 16.
- the areas of greatest need addressed by the activity or activities,
Yes No Verification found on page 8- 16.
- expected benefit to income-qualified persons or households or areas,
Yes No Verification found on page 8- 16.
- 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 8.
- appropriate performance measures for the activity,
Yes No Verification found on page 8- 16.
- amount of funds budgeted for the activity,
Yes No Verification found on page 8- 16.
- the name, location and contact information for the entity that will carry out the activity,
Yes No Verification found on page 8- 16.
- expected start and end dates of the activity?
Yes No Verification found on page 8- 16.
- If the activity includes acquisition of real property, the discount required for acquisition of foreclosed upon properties,
Yes No Verification found on page 10.

- If the activity provides financing, the range of interest rates (if any),
Yes No . Verification found on page 10,16.
- If the activity provides housing, duration or term of assistance,
Yes No . Verification found on page 8-11.
- tenure of beneficiaries (e.g., rental or homeownership),
Yes No . Verification found on page 8-11.
- does it ensure continued affordability?
Yes No . Verification found on page 8-11.

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 ≤ 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"/> |