

HENNEPIN COUNTY CONSORTIUM 2010 ACTION PLAN



NSP3 SUBSTANTIAL AMENDMENT

Approved by HUD
March 10, 2011

Housing,
Community Works
and Transit



Consortium Members:
Urban Hennepin County
Bloomington • Eden Prairie •
Minnetonka • Plymouth



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**APPLICATION FOR
FEDERAL ASSISTANCE**

OMB Approved No. 3076-0006

Version 7/03

| | | | |
|--|-----------------------|---|---|
| 1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction | | 2. DATE SUBMITTED March 1, 2011 | Applicant Identifier |
| <input type="checkbox"/> Pre-application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction | | 3. DATE RECEIVED BY STATE | State Application Identifier |
| | | 4. DATE RECEIVED BY FEDERAL AGENCY | Federal Identifier B-11-JN-27-0003 |
| 5. APPLICANT INFORMATION | | | |
| Legal Name: Urban Hennepin County | | Organizational Unit: Department: Housing, Community Works & Transit | |
| Organizational DUNS: 140042941 | | Division: Housing Division | |
| Address: Street: 417 North Fifth Street, Suite 320 | | Name and telephone number of person to be contacted on matters involving this application (give area code) | |
| City: Minneapolis | | Prefix: Mr. | First Name: Kevin |
| County: Hennepin County | | Middle Name | |
| State: Mn | | Last Name Dockry | |
| Zip Code 55401 | | Suffix: | |
| Country: United States | | Email: kevin.dockry@co.hennepin.mn.us | |
| 6. EMPLOYER IDENTIFICATION NUMBER (EIN): 41-6005301 | | Phone Number (give area code) 612-348-2270 | Fax Number (give area code) 612-348-2920 |
| 8. TYPE OF APPLICATION: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) | | 7. TYPE OF APPLICANT: (See back of form for Application Types) B. County Other (specify) | |
| Other (specify) | | 9. NAME OF FEDERAL AGENCY: U.S. Department of Housing and Urban Development | |
| 10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: TITLE (Name of Program): Community Development Block Grant | | 11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: NSP3 Grant Application Submission -- 2010 Substantial Amendment | |
| 12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): | | | |
| 13. PROPOSED PROJECT Start Date: 05/01/2011 | | 14. CONGRESSIONAL DISTRICTS OF: a. Applicant 3,5,6 | |
| Ending Date: 05/01/2015 | | b. Project 3,5,6 | |
| 15. ESTIMATED FUNDING: | | 16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? | |
| a. Federal | \$ 1,469,133.00 | a. Yes. <input checked="" type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON | |
| b. Applicant | \$.00 | DATE: | |
| c. State | \$.00 | b. No. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372 | |
| d. Local | \$.00 | <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW | |
| e. Other | \$.00 | 17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? | |
| f. Program Income | \$.00 | <input type="checkbox"/> Yes If "Yes" attach an explanation. <input checked="" type="checkbox"/> No | |
| g. TOTAL | \$ 1,469,133.00 | | |
| 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. | | | |
| a. Authorized Representative | | | |
| Prefix Mr. | First Name Richard | Middle Name P. | Suffix |
| Last Name Johnson | | c. Telephone Number (give area code) 612-348-4447 | |
| b. Title County Administrator | | e. Date Signed 2-23-11 | |
| d. Signature of Authorized Representative <i>Richard P. Johnson</i> | | | |

INSTRUCTIONS FOR THE SF-424

Public reporting burden for this collection of information is estimated to average 45 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0043), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

This is a standard form used by applicants as a required face sheet for pre-applications and applications submitted for Federal assistance. It will be used by Federal agencies to obtain applicant certification that States which have established a review and comment procedure in response to Executive Order 12372 and have selected the program to be included in their process, have been given an opportunity to review the applicant's submission.

| Item: | Entry: | Item: | Entry: | | | | | | | | | | | | | | | | |
|--------------------------------|---|-------------------|---|----------------------|-----------------------|--------------|---|-------------|---------------|---------------|------------------------|-------------------|--------------------|---------------------|--------------------------------|--------------------------------|--|-----|---|
| 1. | Select Type of Submission. | 11. | Enter a brief descriptive title of the project. If more than one program is involved, you should append an explanation on a separate sheet. If appropriate (e.g., construction or real property projects), attach a map showing project location. For preapplications, use a separate sheet to provide a summary description of this project. | | | | | | | | | | | | | | | | |
| 2. | Date application submitted to Federal agency (or State if applicable) and applicant's control number (if applicable). | 12. | List only the largest political entities affected (e.g., State, counties, cities). | | | | | | | | | | | | | | | | |
| 3. | State use only (if applicable). | 13. | Enter the proposed start date and end date of the project. | | | | | | | | | | | | | | | | |
| 4. | Enter Date Received by Federal Agency Federal identifier number: If this application is a continuation or revision to an existing award, enter the present Federal Identifier number. If for a new project, leave blank. | 14. | List the applicant's Congressional District and any District(s) affected by the program or project | | | | | | | | | | | | | | | | |
| 5. | Enter legal name of applicant, name of primary organizational unit (including division, if applicable), which will undertake the assistance activity, enter the organization's DUNS number (received from Dun and Bradstreet), enter the complete address of the applicant (including country), and name, telephone number, e-mail and fax of the person to contact on matters related to this application. | 15. | Amount requested or to be contributed during the first funding/budget period by each contributor. Value of in kind contributions should be included on appropriate lines as applicable. If the action will result in a dollar change to an existing award, indicate only the amount of the change. For decreases, enclose the amounts in parentheses. If both basic and supplemental amounts are included, show breakdown on an attached sheet. For multiple program funding, use totals and show breakdown using same categories as item 15. | | | | | | | | | | | | | | | | |
| 6. | Enter Employer Identification Number (EIN) as assigned by the Internal Revenue Service. | 16. | Applicants should contact the State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the State intergovernmental review process. | | | | | | | | | | | | | | | | |
| 7. | Select the appropriate letter in the space provided. <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">A. State</td> <td style="width: 50%;">I. State Controlled Institution of Higher Learning</td> </tr> <tr> <td>B. County</td> <td>J. Private University</td> </tr> <tr> <td>C. Municipal</td> <td>K. Indian Tribe</td> </tr> <tr> <td>D. Township</td> <td>L. Individual</td> </tr> <tr> <td>E. Interstate</td> <td>M. Profit Organization</td> </tr> <tr> <td>F. Intermunicipal</td> <td>N. Other (Specify)</td> </tr> <tr> <td>G. Special District</td> <td>O. Not for Profit Organization</td> </tr> <tr> <td>H. Independent School District</td> <td></td> </tr> </table> | A. State | I. State Controlled Institution of Higher Learning | B. County | J. Private University | C. Municipal | K. Indian Tribe | D. Township | L. Individual | E. Interstate | M. Profit Organization | F. Intermunicipal | N. Other (Specify) | G. Special District | O. Not for Profit Organization | H. Independent School District | | 17. | This question applies to the applicant organization, not the person who signs as the authorized representative. Categories of debt include delinquent audit disallowances, loans and taxes. |
| A. State | I. State Controlled Institution of Higher Learning | | | | | | | | | | | | | | | | | | |
| B. County | J. Private University | | | | | | | | | | | | | | | | | | |
| C. Municipal | K. Indian Tribe | | | | | | | | | | | | | | | | | | |
| D. Township | L. Individual | | | | | | | | | | | | | | | | | | |
| E. Interstate | M. Profit Organization | | | | | | | | | | | | | | | | | | |
| F. Intermunicipal | N. Other (Specify) | | | | | | | | | | | | | | | | | | |
| G. Special District | O. Not for Profit Organization | | | | | | | | | | | | | | | | | | |
| H. Independent School District | | | | | | | | | | | | | | | | | | | |
| 8. | Select the type from the following list: <ul style="list-style-type: none"> • "New" means a new assistance award. • "Continuation" means an extension for an additional funding/budget period for a project with a projected completion date. • "Revision" means any change in the Federal Government's financial obligation or contingent liability from an existing obligation. If a revision enter the appropriate letter: <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">A. Increase Award</td> <td style="width: 50%;">B. Decrease Award</td> </tr> <tr> <td>C. Increase Duration</td> <td>D. Decrease Duration</td> </tr> </table> | A. Increase Award | B. Decrease Award | C. Increase Duration | D. Decrease Duration | 18. | To be signed by the authorized representative of the applicant. A copy of the governing body's authorization for you to sign this application as official representative must be on file in the applicant's office. (Certain Federal agencies may require that this authorization be submitted as part of the application.) | | | | | | | | | | | | |
| A. Increase Award | B. Decrease Award | | | | | | | | | | | | | | | | | | |
| C. Increase Duration | D. Decrease Duration | | | | | | | | | | | | | | | | | | |
| 9. | Name of Federal agency from which assistance is being requested with this application. | | | | | | | | | | | | | | | | | | |
| 10. | Use the Catalog of Federal Domestic Assistance number and title of the program under which assistance is requested. | | | | | | | | | | | | | | | | | | |

1. NSP3 Grantee Information

| NSP3 Program Administrator Contact Information | |
|--|--|
| Name (Last, First) | Kevin Dockry |
| Email Address | kevin.dockry@co.hennepin.mn.us |
| Phone Number | 612-348-2270 |
| Mailing Address | 417 N. Fifth Street, Minneapolis, MN 55401 |

2. Areas of Greatest Need

Map Submission

The map generated at the HUD NSP3 Mapping Tool for Preparing Action Plan website is included as **ATTACHMENT A**.

Data Sources Used to Determine Areas of Greatest Need

Describe the data sources used to determine the areas of greatest need.

Response:
HUD Foreclosure Need Index Score
Minneapolis Area Association of Realtors
Hennepin County Sheriff's Sales Data
Brooklyn Center Vacancy Report
Brooklyn Park Vacancy Report

Determination of Areas of Greatest Need and Applicable Tiers

Describe how the areas of greatest need were established and whether a tiered approach is being utilized to determine the distribution of funding.

Response:

Hennepin County, located within the Minneapolis-St. Paul-Bloomington, MN-WI MSA, is the largest unit of local government in the State of Minnesota. There are 46 municipalities within the County, with an estimated population of over 1.1 million people. Approximately one-third of the County's population lives in Minneapolis with the remaining two-thirds residing in suburban Hennepin County. The County encompasses 611 square miles.

According to the U.S. Census Bureau, 2005-2009 American Community Survey, there are an estimated 501,738 housing units in Hennepin County; approximately 6 percent of the housing units are vacant; approximately 66 percent of the occupied housing units are owner-occupied.

Both in-court and out-of-court foreclosure proceedings are used in Minnesota; with both types of foreclosure proceedings, the borrower can stop the foreclosure any time before the foreclosure sale by paying the default amount, plus fees and allowable costs. The timeline for a Minnesota foreclosure is approximately four months, not including the redemption period (a borrower usually has a six-month

redemption period, but some property types and mortgages allow for a 12-month redemption period).

Consistent with national trends, Hennepin County has been significantly impacted by high rates of mortgage foreclosure. The number of mortgage foreclosure sales in Hennepin County (including suburban Hennepin County and the City of Minneapolis) increased from 920 in 2002 to 6,160 in 2010, peaking at 7,348 in 2008. The cities of Brooklyn Center, Brooklyn Park and Minneapolis have consistently experienced the greatest number of foreclosures.

According to the Minneapolis Area Association of Realtors, 2010 was the worst year for home sales in the Twin Cities metropolitan area since the association began tracking sales nearly a decade ago (the number of homes sold fell 17 percent from 2009). The median sales price rose a modest 2.3 percent. According to RealtyTrac, the number of default notices sent in Minnesota during 2010 was approximately 1 percent below 2009 and 54 percent ahead of 2008. It is difficult to predict how long these foreclosures will remain in the pipeline, but experts expect foreclosures to remain at historically high levels for the next two to three years.

Mortgages are difficult to come by and prospective buyers are worried about falling home prices and job security (unemployment in the state (7.1 percent), while better than the national average, is still high). While the overall Minnesota economy is projected to recover moderately in 2011, housing markets are expected to continue to struggle. Unlike most economic recoveries in which employment follows a recovery in housing, experts suggest that the current recovery will happen in reverse.

Intuitively, one would expect it easy to acquire foreclosed homes during a time of high foreclosures and low home sales. It remains difficult however, to predict future market conditions on a micro- or neighborhood level. In recent months, the County and its partners have found it challenging to acquire foreclosed properties at price points that work within a broader neighborhood revitalization strategy (for example, during one month last fall one community submitted 29 purchase offers but successfully acquired only two properties).

To best offset this imbalance, the County and its partners work closely with the National Community Stabilization Trust's First Look Program through the Twin Cities Community Land Bank. Additionally, the County has identified larger NSP3 target areas with the goal of focusing on those areas providing best access to foreclosed properties. To incorporate this flexibility within the County's NSP3 plan, the County has enhanced HUD Impact data with current municipal vacancy and foreclosure recovery data – providing a more accurate estimate of the number of recovered homes necessary to impact each target neighborhood; the County has also layered NSP3 census tracts on top of NSP1 census tracts to leverage the use of NSP1 program income. Finally, the County has considered proximity to transit, employment, and services to maximize the benefits of NSP3.

The goal of the Hennepin County NSP3 Plan is to continue to stabilize the hardest hit suburban neighborhoods, positioning them for a full recovery as the employment markets rebound. NSP3 activities are consistent with each city's goal of maintaining and improving the existing housing stock; foreclosure has provided unique municipal access to some of the most poorly maintained housing units, and the ability to make significant improvements (including energy efficiency). The NSP3 Plan is also consistent with the Hennepin County Consortium Consolidated Plan FY 2010-2014, prepared to meet statutory planning and application requirements for the receipt and use of HUD funding programs in

Suburban Hennepin County. Foreclosure recovery activities are included in Consolidated Plan Strategy 9: Neighborhood Revitalization (Acquisition for Rehab/Clearance).

Goals: Improve property values and stabilize tax base; remove blighting influences and vacant structures.

Outputs/Measures: # occupied homes; # of units rehabilitated

Outcomes: Increased home sales; stabilized population and property values.

HUD Foreclosure Need Index Score

To estimate the level of need down to the neighborhood level (census tract block group), HUD uses a model that takes into account causes of foreclosures and delinquencies, which include housing price declines from peak levels, and increases in unemployment, and rate of high cost and highly leveraged loans. HUD also considers vacancy problems in neighborhoods with severe foreclosure related problems. Census tract block groups receive a score of 1 to 20, with 20 identifying areas of greatest need. HUD requires grantees to target their NSP3 funds by using HUD's Foreclosure Need Index Score and requires an average score for all areas not less than 17.

Using the HUD Foreclosure Need Index Score, Hennepin County identified 22 census tract block groups with a need score of 20 (12 in the city of Brooklyn Center and 10 in the city of Brooklyn Park), 42 census tract block groups with a need score of 19 (18 in the city of Brooklyn Center and 24 in the city of Brooklyn Park), 8 census tract block groups with a need score of 18 (3 in the city of Bloomington and 5 in the city of Richfield), and 34 census tract block groups with a need score of 17 (5 in the city of Bloomington, 4 in the city of Champlin, 7 in the city of Crystal, 9 in the city of Richfield, 7 in the city of Robbinsdale, and 2 in the city of St. Louis Park).

Hennepin County Sheriff Foreclosure Sales

Using foreclosure sales data from the Hennepin County Sheriff's Office from 2007, 2008 and 2009, Hennepin County ranked cities by number of foreclosures (1. Brooklyn Park – 3,022; 2. Brooklyn Center – 1,316; 3. Bloomington – 1,017; 4. Maple Grove – 933; 5. Richfield – 696; 6. Eden Prairie – 693; 7. Plymouth – 656; 8. Crystal – 600; 9. Minnetonka – 565; and 10. St. Louis Park – 531) and annual average percent of housing units foreclosed (1. Brooklyn Center – 3.08%; 2. Brooklyn Park – 2.84%; 3. Rogers – 1.95%; 4. Greenfield – 1.94%; 5. Crystal – 1.63%; 6. Mound – 1.62%; 7. Robbinsdale – 1.48% and Minnetrista – 1.48%; 9. Champlin – 1.41%; and 10. Saint Bonifacius – 1.36%).

To stabilize a neighborhood, HUD recommends grantees select target areas small enough so that at least 20 percent of the real estate owned (REO) properties in the target area receive assistance. Due to limited funding, grantees are required to narrow their targeting to a few census tract block groups. Assuming an average of \$50,000 in NSP3 assistance per unit, the County estimates that approximately 5-10 block groups can be targeted.

The cities of Brooklyn Center and Brooklyn Park had the greatest number of high need census tract block groups, the highest number of foreclosures, and the highest annual average percent of housing units foreclosed. Between the two cities, there are a total of 59 census tract block groups with a HUD

Foreclosure Need Index Score of 19 or higher (no other suburban Hennepin County block group received a score higher than 18).

To further narrow the targeting, Hennepin County worked with city staff to further evaluate city vacancy figures, access to transit, employers and services, support of other public/private investments, and general real estate market conditions (i.e. perceived ability to acquire and sell homes).

Based on the above analysis, Hennepin County has identified 10 target neighborhoods: Census Tract 203.04 Block Groups 1 and 3; Census Tract 205.00 Block Groups 2 and 3; Census Tract 268.14 Block Groups 1, 4 and 5; Census Tract 268.15 Block Groups 2 and 3; and Census Tract 268.16 Block Group 5.

According to HUD data, the cumulative Impact number for the above 10 neighborhoods is 44 properties. County and city staff evaluated the HUD Impact figures against local recovery data (according to the Brooklyn Center 4-Step Foreclosure Strategy and Brooklyn Park Foreclosure Initiatives plan, 24 target area properties were recovered in the past 12 months) and local vacancy data to arrive at consensus figures for the number of NSP3 units necessary to achieve a neighborhood impact:

- 203.04 - 1 Properties to impact = 5 (HUD Impact = 5)
- 203.04 - 3 Properties to impact = 3 (HUD Impact = 3)
- 205.00 - 2 Properties to impact = 1 (HUD Impact = 5)
- 205.00 - 3 Properties to impact = 4 (HUD Impact = 4)
- 268.14 - 1 Properties to impact = 3 (HUD Impact = 4)
- 268.14 - 4 Properties to impact = 3 (HUD Impact = 5)
- 268.14 - 5 Properties to impact = 3 (HUD Impact = 5)
- 268.15 - 2 Properties to impact = 2 (HUD Impact = 3)
- 268.15 - 3 Properties to impact = 4 (HUD Impact = 4)
- 268.16 - 5 Properties to impact = 3 (HUD Impact = 6)

HUD encourages grantees to carry out its NSP3 activities in the context of a comprehensive plan which includes consideration of access to transit, employment and services. The ten neighborhoods identified above all meet a minimum threshold job count based on the median number of low and moderate wage jobs per block group or provide access to employment via a transit stop within ½ mile.

HUD also encourages grantees to carry out its NSP3 activities near redevelopment anchors or already targeted redevelopment area. County staff has identified a number of projects in, adjacent, or in close proximity to selected NSP3 target areas, including:

The **Bottineau Transitway Corridor** extends from Downtown Minneapolis through North Minneapolis and the Northwest Suburbs of the Twin Cities including; Golden Valley, Robbinsdale, Crystal, New Hope, Brooklyn Park, Osseo, and Maple Grove, generally following Bottineau Boulevard (County Road 81). In addition, the travel shed for this corridor extends through the rapidly growing communities of Dayton, Rogers, and Hassan Township.

In 2005, the County partnered with Brooklyn Park to create the **Stable Neighborhood Action Plan (SNAP)** to address multiple challenges affecting the area surrounding Brooklyn Boulevard and Zane Avenue, including obsolete housing, aging infrastructure, relatively high rates of crime, and ineffective transportation linkages. The County provided \$200,000 in capital funding for the planning effort.

Over \$28 million has been invested in the **Village Creek Corridor Project** since 2000, including \$2 million from the County for public improvements (new roadway and pedestrian paths, park space, lighting, and improvements to Shingle Creek).

Village Creek Police Station: Acquisition and redevelopment of an existing vacant commercial building providing police, community meeting space and 24-hour a day face-to-face access to city resources. Hennepin County capital funding: \$872,597 (federal CDBG); \$400,000 (Hennepin County capital bond funding).

Hennepin County Medical Center's Brooklyn Park Clinic, at the intersection of Zane Avenue and Brooklyn Boulevard, opened Nov. 17. It's the fifth primary care clinic to join Hennepin Health System's network of community clinics outside downtown Minneapolis. The 12,000 square-foot clinic will serve up to 25,000 patients a year and provide services in family medicine, OB/GYN, certified nurse-midwives and pediatrics.

Hennepin County Library: New \$25 million library at the intersection of West Broadway and 85th Avenue North; will at least double the size of the current 15,183 sq. ft. facility.

Northwest Family Service Center (CEAP, ISD #279, Hennepin County Human Services and Public Health Department, Hennepin County Housing and Redevelopment Authority). 63,362 sq. ft. addition to the Adult Education Building located at 7051 Brooklyn Boulevard. The \$27.03 million project will be financed with a loan from the Hennepin County Housing and Redevelopment Authority (up to \$18.2 million), New Market Tax Credit financing (\$6.8 million), and State bonding (\$2 million).

The City of Brooklyn Center is the recipient of \$2 million in federal stimulus funds for the **Bass Lake Road (County Road 10) Streetscape and Regional Trail Project**, announced by the Metropolitan Council in June 2009. Extending along Bass Lake Road from Brooklyn Boulevard to Highway 100, this project will consist of many design aspects including:

- Regional Trail Connection. A missing segment of the regional trail system will be constructed, providing a central connection to existing regional trails.
- Pedestrian Safety. Design elements will encourage safe pedestrian routes and street crossings.
- Water Quality. Biofiltration systems will enable treatment of roadway runoff that may be contaminated with chloride from de-icing efforts before it discharges into Shingle Creek.
- Streetscaping. Multi-function aesthetic features will promote safety and beauty, including landscaping, pedestrian plaza and benches, lighting and colored concrete. The look will be coordinated with Xerxes Avenue streetscaping to provide a consistent feel to the area.

Hennepin County has identified a number of additional block groups meeting the above criteria that are not included in this Plan due to limited funding resources. These block groups may be added via substantial amendment should the County be unable to successfully acquire and dispose of property in the Plan block groups: Census tract 202.00 Block Group 3 (Hennepin County is monitoring a large multi-family rental apartment building that may go foreclosed in the near future); Census Tract 203.04 Block Group 2; Census Tract 205.00 Block Group 1; Census Tract 268.14 Block Groups 2 and 3; and Census Tract 268.16 Block Groups 1, 2 and 4. Again, these neighborhoods are not included in this Plan at this time.

3. Definitions and Descriptions

Definitions

| Term | Definition | | | | | | | | | | | | | | | | |
|--------------------|--|-----|-----|-------|-------|-------|-------|-----|-----|-----|-----|-----|-----|-------|-------|-------|-------|
| Blighted Structure | <p>For the purposes of NSP, Minnesota Housing has modified the State of Minnesota’s definition of “blighted area” to apply to structures. Consistent with NSP1 and NSP2, Hennepin County will adopt the State of Minnesota’s definition of “blighted area,” as modified to define a “blighted structure,” as follows:</p> <p>Blighted structure. A blighted structure is one which, by reason of dilapidation, obsolescence, overcrowding, faulty arrangement or design, lack of ventilation, light, and sanitary facilities, excessive land coverage, deleterious land use, or obsolete layout, or any combination of these or other factors, is detrimental to the safety, health, morals, or welfare of the community.</p> | | | | | | | | | | | | | | | | |
| Affordable Rents | <p>Hennepin County will adopt the definition of affordable rents that is contained in 24 CFR 92.252(a) for rental properties. This definition is consistent with the continued affordability requirements of the same section that Hennepin County will adopt for the NSP Program. Below is the table listing the current HOME rents per 92.252 (a) for Hennepin County.</p> <table border="1" data-bbox="516 1031 1295 1171"> <thead> <tr> <th>SRO</th> <th>OBR</th> <th>1BR</th> <th>2BR</th> <th>3BR</th> <th>4BR</th> <th>5BR</th> <th>6BR</th> </tr> </thead> <tbody> <tr> <td>471</td> <td>628</td> <td>741</td> <td>899</td> <td>1,177</td> <td>1,322</td> <td>1,520</td> <td>1,719</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • High HOME rents are the lesser of the Fair Market Rent or the 65% rent limit. • Limit for Single Room Occupancy (SRO) units -- most will be 75% of Efficiency limit (Efficiency/0 BR) \$628 x 75% = \$471 | SRO | OBR | 1BR | 2BR | 3BR | 4BR | 5BR | 6BR | 471 | 628 | 741 | 899 | 1,177 | 1,322 | 1,520 | 1,719 |
| SRO | OBR | 1BR | 2BR | 3BR | 4BR | 5BR | 6BR | | | | | | | | | | |
| 471 | 628 | 741 | 899 | 1,177 | 1,322 | 1,520 | 1,719 | | | | | | | | | | |

Descriptions

| Term | Definition | | | | | | | | | | |
|----------------------------------|--|-----|----------------------|----------------|--------|----------------------|----------|---------------|----------|-------------------------|----------|
| Long-Term Affordability | <p>Program loan documents will include the affordability requirements of 24 CFR 92.252(a), (c), (e) and (f) for rental property and 92.254 for homeownership property. Affordability requirements for properties will be specified in the loan and/or mortgage documents, and a deed restriction or covenant similar to the HOME Program. Mortgages and deed restrictions or covenants will be recorded against the property and become part of the public record for the following minimum years.</p> <table border="1" data-bbox="537 583 1360 911"> <thead> <tr> <th data-bbox="542 590 1008 667">NSP</th> <th data-bbox="1015 590 1356 667">Affordability Period</th> </tr> </thead> <tbody> <tr> <td data-bbox="542 676 1008 730">Under \$15,000</td> <td data-bbox="1015 676 1356 730">5 year</td> </tr> <tr> <td data-bbox="542 739 1008 793">\$15,000 to \$40,000</td> <td data-bbox="1015 739 1356 793">10 years</td> </tr> <tr> <td data-bbox="542 802 1008 856">Over \$40,000</td> <td data-bbox="1015 802 1356 856">15 years</td> </tr> <tr> <td data-bbox="542 865 1008 919">New Construction Rental</td> <td data-bbox="1015 865 1356 919">20 years</td> </tr> </tbody> </table> | NSP | Affordability Period | Under \$15,000 | 5 year | \$15,000 to \$40,000 | 10 years | Over \$40,000 | 15 years | New Construction Rental | 20 years |
| NSP | Affordability Period | | | | | | | | | | |
| Under \$15,000 | 5 year | | | | | | | | | | |
| \$15,000 to \$40,000 | 10 years | | | | | | | | | | |
| Over \$40,000 | 15 years | | | | | | | | | | |
| New Construction Rental | 20 years | | | | | | | | | | |
| Housing Rehabilitation Standards | <p>The Construction and Rehabilitation Standards adopted by the Hennepin Housing Consortium (HHC) for the HOME Program (posted on the Hennepin County website at (www.hennepin.us)) shall apply to all housing projects assisted with NSP funding. The Construction and Rehabilitation Standards define a standard and code compliance level for the construction and rehabilitation necessary to correct health, safety and building code violations to achieve decent, sanitary, safe and affordable housing. The Construction and Rehabilitation Standards include the Lead Based Paint requirements.</p> <p>Standards also include the following NSP requirements:</p> <ul style="list-style-type: none"> ○ All gut rehabilitation or new construction (i.e., general replacement of the interior of a building that may or may not include changes to structural elements such as flooring systems, columns or load bearing interior or exterior walls) of residential buildings up to three stories must be designed to meet the standard for Energy Star Qualified New Homes. ○ All gut rehabilitation or new construction of mid -or high-rise multifamily housing must be designed to meet American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Standard 90.1-2004, Appendix G plus 20 percent (which is the Energy Star standard for multifamily buildings piloted by the Environmental Protection Agency and the Department of Energy). ○ Other rehabilitation must meet these standards to the extent applicable to the rehabilitation work undertaken, e.g., replace older obsolete products and appliances (such as windows, doors, lighting, | | | | | | | | | | |

| | |
|--|---|
| | <p>hot water heaters, furnaces, boilers, air conditioning units, refrigerators, clothes washers and dishwashers) with Energy Star-46 labeled products.</p> <ul style="list-style-type: none"> ○ Water efficient toilets, showers, and faucets, such as those with the WaterSense label, must be installed. ○ Where relevant, the housing should be improved to mitigate the impact of disasters (e.g., earthquake, hurricane, flooding, fires). <p>Hennepin County will also encourage inclusion of the following design features in all activities to help reduce energy expenditures, enhance the health, well-being and productivity of the building occupants in NSP assisted projects:</p> <ul style="list-style-type: none"> ❖ MINNESOTA HOUSING OVERLAY TO THE MN GREEN COMMUNITIES CRITERIA. WWW.MNHOUSING.GOV ❖ SUSTAINABLE DESIGN. WWW.SUSTAINABLEDESIGNGUIDE.UMN.EDU ❖ ENERGY STAR PRODUCTS, STANDARDS AND BUILDING CERTIFICATION. WWW.ENERGYSTAR.GOV ❖ The Principals of Universal Design; “The design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.” more information can be found at the Center for Universal Design. www.design.ncsu.edu/cud/ |
|--|---|

4. Low-Income Targeting

Low-Income Set-Aside Amount

Enter the low-income set-aside percentage in the first field. The field for total funds set aside will populate based on the percentage entered in the first field and the total NSP3 grant.

Identify the estimated amount of funds appropriated or otherwise made available under the NSP3 to be used to provide housing for individuals or families whose incomes do not exceed 50 percent of area median income.

Response:

Total low-income set-aside **percentage** (must be no less than 25 percent): 25.00%

Total funds set aside for low-income individuals = \$368,000

Meeting Low-Income Target

Provide a summary that describes the manner in which the low-income targeting goals will be met.

Response:

Strategy 1: Developer Financing Homeownership. Similar to NSP1 and NSP2, Hennepin County would provide developer financing for acquisition and rehabilitation by a nonprofit such as Habitat for Humanity or West Hennepin Affordable Housing Land Trust.

Strategy 2: Development Financing Single-Family Rental. Hennepin County staff has contacted several

Special Needs housing providers (CIP, Task Unlimited, Minnesota Assistance Council for Veterans (MACV)). Hennepin County would fully-fund the acquisition and rehabilitation of 2 or 3 properties (rehab work may be done by the County’s Sentence To Serve (STS) Homes program) and turn over the completed property to the nonprofit service provider debt-free. Note: Single-family rental requires additional city council approvals.

Strategy 3: Development Financing Multifamily Rental. Hennepin County has identified a potential delinquent 13-story high-rise apartment building that provides 122 units of affordable housing (Shingle Creek Towers, 6221 Shingle Creek Parkway, Brooklyn Center). The property is located in the Brookdale area of Brooklyn Center and within three blocks of supermarkets, drug stores, a regional library and county social service agencies. The city of Brooklyn Center’s community center is less than one block away. Public transportation is available within one block. As a result of the project’s financial performance, the County understands that the current owners are delinquent on their HUD first mortgage. The estimated market value established by the assessor January 2, 2009 (for taxes payable 2010) was \$6,023,000. Several developers have expressed an interest. HUD plans and timing are unknown at this time. If realistic development plans are identified and prepared before NSP3 funding is exhausted, Hennepin County may consider an NSP3 acquisition/rehabilitation loan. Any such activities would require an additional substantial amendment.

5. Acquisition and Relocation

Demolition or Conversion of LMI Units

| | |
|---|----|
| Does the grantee intend to demolish or convert any low- and moderate-income dwelling units (i.e., ≤ 80% of area median income)? | No |
|---|----|

If yes, fill in the table below.

| Question | Number of Units |
|--|-----------------|
| 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. | 0 |
| 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). | 31 |
| The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income. | 2 |

6. Public Comment

Citizen Participation Plan

| |
|--|
| Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment or abbreviated plan. |
| Response: The draft NSP3 Substantial Amendment for Hennepin County was made available for a 15 public |

comment period starting on January 18, 2011, on the Hennepin County website at www.hennepin.us. The public was notified of the availability of the draft Neighborhood Stabilization Program Substantial Amendment through legal notice in Finance and Commerce newspaper. Public comment was solicited for a 15-day period. The notice stated that copies of the report were available for public review in the three regional Hennepin County libraries and on the Hennepin County website. In addition, over 100 individuals and agencies received written or electronic notification of the report's availability. The Hennepin County Board of Commissioners approved the substantial Amendment at its February 8, 2011 Board meeting.

Summary of Public Comments Received.

Comments were received from the following individuals/agencies:

- Legal Aid Society of Minneapolis

A copy of the comments and the County's written response is included as **ATTACHMENT B**.

7. NSP Information by Activity

Enter each activity name and fill in the corresponding information. If you have fewer than seven activities, please delete any extra activity fields. (For example, if you have three activities, you should delete the tables labeled "Activity Number 4," "Activity Number 5," "Activity Number 6," and "Activity Number 7." If you are unsure how to delete a table, see the instructions [above](#).

The field labeled "Total Budget for Activity" will populate based on the figures entered in the fields above it.

Consult the [NSP3 Program Design Guidebook](#) for guidance on completing the "Performance Measures" component of the activity tables below.

| Activity Number 1 | |
|------------------------------------|---|
| Activity Name | 9.0 Neighborhood Revitalization – NSP3 Brooklyn Park & Brooklyn Center |
| Uses | Select all that apply: <input type="checkbox"/> Eligible Use A: Financing Mechanisms <input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation <input type="checkbox"/> Eligible Use C: Land Banking <input type="checkbox"/> Eligible Use D: Demolition <input checked="" type="checkbox"/> Eligible Use E: Redevelopment |
| CDBG Activity or Activities | 24 CFR 570.201 (a) Acquisition, (b) Disposition, (c) Public facilities and improvements, (e) Public services for housing counseling, but only to the extent that counseling beneficiaries are limited to prospective purchasers or tenants of the redeveloped properties, (i) Relocation, and (n) Direct homeownership assistance (as modified below). 24 CFR 570.202 Eligible rehabilitation and preservation activities for demolished or vacant properties. 24 CFR 570.204 Community based development organizations. Any of the activities listed above may include required homebuyer counseling as an activity delivery cost. New construction of housing is eligible as part of the redevelopment of demolished or vacant properties. |
| National Objective | Low Moderate Middle Income Housing (LMMH) |
| Activity Description | NSP3 funding will continue efforts started with approximately \$6 million in NSP1 and NSP2 funding awarded to the Hennepin County and the cities of Brooklyn Center and Brooklyn Park. NSP3 funds will be used in coordination with each city’s foreclosure recovery plan: Brooklyn Center has a comprehensive 4-Step Foreclosure Strategy to stabilize neighborhoods and help ensure properties are brought back to a productive use. Foreclosed vacant properties are eligible for certain city Housing Programs (subject to funding availability). Brooklyn Park continues to implement the <i>Brooklyn Park Foreclosure Initiatives</i> plan. The plan is a 3-part comprehensive foreclosure strategy to further address the need for foreclosure prevention, identify ways to manage foreclosed and secure vacant homes, and ultimately transition homes back to owner-occupancy as quickly as possible. Each city has allocated non-NSP funding towards home buyer assistance (Brooklyn Center ReNew Home Purchase Program; Brooklyn Park Homebuyer Initiative) and home improvement loans (Hennepin County CDBG Rehab Program in both cities; Brooklyn Park Loan Program and Brooklyn Park Home Energy Loan Program). The Brooklyn park EDA operates a Foreclosure |

Recovery Program that makes certain public assistance available to private developers for the acquisition and rehabilitation of foreclosed properties for resale to qualified buyers; in June 2010 the EDA allocated \$1.5 million in local funding to the program.

For NSP3, Hennepin County would provide the developer no interest financing for the acquisition, rehabilitation, and resale of the property to a homebuyer. For the units to be sold to 120% AMI households, we anticipate working with entities that have been successful creating homeownership opportunities under the previous program.

To assist in meeting occupant affordability requirements, some or all of the original NSP investment may remain in the property. Assistance will be provided to the buyer at closing and will be structured in the form of a deferred, forgivable loan using the recapture provision. The loan term will be based on the HOME required periods of affordability listed in the definitions

Providing buyers with units that have been substantially improved with energy efficiency features and major system replacements greatly reduces the need for the acquiring household to make any large investments or incur additional debt to repair the property. In addition all prospective buyers will be required to attend a minimum of one eight-hour pre-acquisition HUD-certified homebuyer counseling session; where available, Hennepin County will also encourage post-acquisition homeownership training. Finally, eligible homebuyers must obtain a prime, fixed rate first mortgage. The homebuyer's principal, interest, taxes, insurance and (if applicable) homeowner association fees shall to the greatest extent feasible not exceed 30 percent of the family's adjusted gross income.

The County has not included a rental housing preference within its NSP3 program. Foreclosures within NSP3 targeted communities have primarily impacted single-family neighborhoods; and a significant majority of properties (approximately 75 percent) within the County's target communities were homesteaded at the time of foreclosure. The County explored scattered site rental models with several of nonprofit affordable housing development partners and found them mostly cost prohibitive without ongoing operating subsidies (which are not currently available). In addition, municipalities have identified difficulties in monitoring and regulating privately-owned scattered site rental properties as a barrier to implementation. Finally, limited NSP3 resources diminish the ability of the County to pursue larger, single-site foreclosed multifamily properties (note: the County has identified one potential property within the NSP3 program – Shingle Creek Towers – however, implementation requires a substantial amendment to this current plan).

Based on the above factors, Hennepin County has elected to focus NSP3 resources on owner-occupied properties. The County will continue to address affordable rental housing through other County administered programs, such

| | | |
|----------------------------------|--|--|
| | <p>as its locally-funded Affordable Housing Incentive Fund, and federally funded HOME Investment Partnerships program and Community Development Block Grant program.</p> <p>With respect to vicinity hiring, to the greatest extent possible, the County and its subrecipients will do its best to:</p> <ul style="list-style-type: none"> • Provide community outreach via city newsletters, etc; • Advertise, identify and select qualified developers from inside the target area, when possible; • Require developers to identify and solicit bids from qualified contractors from the target area, when possible; • Require contractors to hire qualified job applicants from inside the target area, when available. | |
| Location Description | Census Tract 203.04 Block Groups 1 and 3; Census Tract 205.00 Block Groups 2 and 3; Census Tract 268.14 Block Groups 1, 4 and 5; Census Tract 268.15 Block Groups 2 and 3; and Census Tract 268.16 Block Group 5 | |
| Budget | Source of Funding | Dollar Amount |
| | NSP3 | \$987,500.00 |
| | NSP1, NSP2, other city sources | \$839,500.00 |
| | (Other funding source) | \$0.00 |
| Total Budget for Activity | \$1,827,000.00 | |
| Performance Measures | The County, city partners or developers will acquire and redevelop 29 single family homes making the total unit count of 29. | |
| Projected Start Date | May 1, 2011 | |
| Projected End Date | May 1, 2015 | |
| Responsible Organization | Name | Hennepin County |
| | Location | 417 5 th Avenue, Minneapolis, MN 55401 |
| | Administrator Contact Info | Kevin Dockry 612-348-2270 kevin.dockry@co.hennepin.mn.us |

| Activity Number 2 | |
|------------------------------------|--|
| Activity Name | 9.0 Neighborhood Revitalization – NSP3 Brooklyn Park & Brooklyn Center-50% households |
| Use | Select all that apply: <input type="checkbox"/> Eligible Use A: Financing Mechanisms <input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation <input type="checkbox"/> Eligible Use C: Land Banking <input type="checkbox"/> Eligible Use D: Demolition <input checked="" type="checkbox"/> Eligible Use E: Redevelopment |
| CDBG Activity or Activities | 24 CFR 570.201 (a) Acquisition, (b) Disposition, (c) Public facilities and improvements, (e) Public services for housing counseling, but only to the extent that counseling beneficiaries are limited to prospective purchasers or tenants of the redeveloped properties, (i) Relocation, and (n) Direct homeownership assistance (as modified below). 24 CFR 570.202 Eligible rehabilitation and preservation activities for demolished or vacant properties. 24 CFR 570.204 Community based development organizations. Any of the activities listed above may include required homebuyer counseling as an activity delivery cost. New construction of housing is eligible as part of the redevelopment of demolished or vacant properties. |
| National Objective | Low-Income Housing to Meet 25% Set-Aside (LH25) |
| Activity Description | Similar to NSP1 and NSP2, Hennepin County will provide developers no interest financing for the acquisition, rehabilitation, and resale of the property to a homebuyer. For the units to be sold to 50% AMI households, we anticipate working with the two entities that are successful in creating homeownership opportunities for this income level. They are Habitat for Humanity and West Hennepin Affordable Housing Land Trust (WHAHLT). Either may do a property directly or work with a developer to complete the unit. To assist in meeting occupant affordability requirements, some or all of the original NSP investment may remain in the property. When working with Habitat for Humanity, financing will be structured to the homebuyer in the form of a deferred, forgivable loan. When working with WHAHLT, funds will be structured as a grant and we will use the resale provision by filing a Declaration of Covenants and Restrictions. The loan term will be based on the HOME required periods of affordability listed in the definitions Providing buyers with units that have been substantially improved with energy efficiency features and major system replacements greatly reduces the need for the acquiring household to make any large investments or incur |

| | | |
|-----------------------------|--|----------------------|
| | <p>additional debt to repair the property. In addition all prospective buyers will be required to attend a minimum of one eight-hour pre-acquisition HUD-certified homebuyer counseling session; where available, Hennepin County will also encourage post-acquisition homeownership training. Finally, eligible homebuyers must obtain a prime, fixed rate first mortgage. The homebuyer's principal, interest, taxes, insurance and (if applicable) homeowner association fees shall to the greatest extent feasible not exceed 30 percent of the family's adjusted gross income.</p> <p>The County has not included a rental housing preference within its NSP3 program. Foreclosures within NSP3 targeted communities have primarily impacted single-family neighborhoods; and a significant majority of properties (approximately 75 percent) within the County's target communities were homesteaded at the time of foreclosure. The County explored scattered site rental models with several of nonprofit affordable housing development partners and found them mostly cost prohibitive without ongoing operating subsidies (which are not currently available). In addition, municipalities have identified difficulties in monitoring and regulating privately-owned scattered site rental properties as a barrier to implementation. Finally, limited NSP3 resources diminish the ability of the County to pursue larger, single-site foreclosed multifamily properties (note: the County has identified one potential property within the NSP3 program – Shingle Creek Towers – however, implementation requires a substantial amendment to this current plan).</p> <p>Based on the above factors, Hennepin County has elected to focus NSP3 resources on owner-occupied properties. The County will continue to address affordable rental housing through other County administered programs, such as its locally-funded Affordable Housing Incentive Fund, and federally funded HOME Investment Partnerships program and Community Development Block Grant program.</p> <p>With respect to vicinity hiring, to the greatest extent possible, the County and its subrecipients will do its best to:</p> <ul style="list-style-type: none"> • Provide community outreach via city newsletters, etc; • Advertise, identify and select qualified developers from inside the target area, when possible; • Require developers to identify and solicit bids from qualified contractors from the target area, when possible; • Require contractors to hire qualified job applicants from inside the target area, when available. | |
| Location Description | Census Tract 203.04 Block Groups 1 and 3; Census Tract 205.00 Block Groups 2 and 3; Census Tract 268.14 Block Groups 1, 4 and 5; Census Tract 268.15 Block Groups 2 and 3; and Census Tract 268.16 Block Group 5 | |
| Budget | Source of Funding | Dollar Amount |
| | NSP3 | \$368,000 |
| | (Other funding source) | \$0 |

| | | |
|----------------------------------|---|--|
| | (Other funding source) | \$0 |
| Total Budget for Activity | | \$368,000 |
| Performance Measures | The County, city partners or developers will acquire and redevelop 2 single family homes making the total unit count 2. | |
| Projected Start Date | May 1, 2011 | |
| Projected End Date | May 1, 2015 | |
| Responsible Organization | Name | Hennepin County |
| | Location | 417 5th Avenue, Minneapolis, MN 55401 |
| | Administrator Contact Info | Kevin Dockry 612-348-2270 kevin.dockry@co.hennepin.mn.us |

| Activity Number 3 | | |
|--|---|--|
| Activity Name | 13.0 Administration | |
| Use | Select all that apply: | |
| | <input type="checkbox"/> Eligible Use A: Financing Mechanisms | |
| | <input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation | |
| | <input type="checkbox"/> Eligible Use C: Land Banking | |
| | <input type="checkbox"/> Eligible Use D: Demolition | |
| <input type="checkbox"/> Eligible Use E: Redevelopment | | |
| CDBG Activity or Activities | Administration | |
| National Objective | 21A General Admin | |
| Activity Description | General Administration | |
| Location Description | Hennepin County | |
| Budget | Source of Funding | Dollar Amount |
| | NSP3 | \$113,633 |
| | (Other funding source) | \$0.00 |
| | (Other funding source) | \$0.00 |
| Total Budget for Activity | \$113,633 | |
| Performance Measures | General Admin | |
| Projected Start Date | May 1,2011 | |
| Projected End Date | May 1, 2015 | |
| Responsible Organization | Name | Kevin Dockry |
| | Location | 417 North Fifth Street, Suite 320 Minneapolis, MN 55401 |
| | Administrator Contact Info | 612-348-2177 kevin.dockry@co.hennepin.mn.us |

8. Certifications

Certifications for State and Entitlement Communities

- (1) **Affirmatively furthering fair housing.** The jurisdiction certifies that it 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-displacement and relocation plan.** The applicant certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.
- (3) **Anti-lobbying.** The jurisdiction must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (4) **Authority of jurisdiction.** The jurisdiction certifies that the consolidated plan or abbreviated plan, as applicable, is authorized under state and local law (as applicable) and that 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.
- (5) **Consistency with plan.** The jurisdiction certifies that the housing activities to be undertaken with NSP funds are consistent with its consolidated plan or abbreviated plan, as applicable.
- (6) **Acquisition and relocation.** The jurisdiction certifies that it 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.
- (7) **Section 3.** The jurisdiction certifies that it 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.
- (8) **Citizen participation.** The jurisdiction certifies that it 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.
- (9) **Following a plan.** The jurisdiction certifies it is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD. [Only States and entitlement jurisdictions use this certification.]
- (10) **Use of funds.** The jurisdiction certifies that it will comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act and Title XII of Division A of the American Recovery and Reinvestment Act of 2009 by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.
- (11) **The jurisdiction certifies:**
 - a. 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; and

- b. 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:

- a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
- b. 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 nonviolent civil rights demonstrations within its jurisdiction.

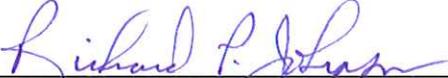
(13) **Compliance with anti-discrimination laws.** The jurisdiction certifies that the NSP grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

(14) **Compliance with lead-based paint procedures.** The jurisdiction certifies that its 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 certifies that it will comply with applicable laws.

(16) **Vicinity hiring.** The jurisdiction certifies that it will, to the maximum extent feasible, provide for hiring of employees that reside in the vicinity of NSP3 funded projects or contract with small businesses that are owned and operated by persons residing in the vicinity of NSP3 projects.

(17) **Development of affordable rental housing.** The jurisdiction certifies that it will abide by the procedures described in its NSP3 Abbreviated Plan to create preferences for the development of affordable rental housing for properties assisted with NSP3 funds.


Signature/Authorized Official

2-23-11
Date

County Administrator
Title

| | |
|---|-------------------------------------|
| <ul style="list-style-type: none"> Affordable rents, | <input checked="" type="checkbox"/> |
| <ul style="list-style-type: none"> Ensuring long term affordability for all NSP funded housing projects, | <input checked="" type="checkbox"/> |
| <ul style="list-style-type: none"> Applicable housing rehabilitation standards for NSP funded projects | <input checked="" type="checkbox"/> |

4. Low-Income Targeting

| | Yes |
|--|-------------------------------------|
| Did you identify the estimated amount of funds appropriated to provide housing that meets the low-income set aside target? | <input checked="" type="checkbox"/> |
| Did you provide a summary describing how your jurisdiction will meet its low-income set aside goals? | <input checked="" type="checkbox"/> |

5. Acquisition & Relocation

| | Yes |
|---|-------------------------------------|
| For all acquisitions that will result in displacement did you specify: | |
| <ul style="list-style-type: none"> The planned activity, | <input checked="" type="checkbox"/> |
| <ul style="list-style-type: none"> The number of units that will result in displacement, | <input checked="" type="checkbox"/> |
| <ul style="list-style-type: none"> The manner in which the grantee will comply with URA for those residents? | <input type="checkbox"/> |

6. Public Comment

| | Yes |
|---|-------------------------------------|
| Did you provide your draft of the NSP3 substantial amendment for a minimum of 15 days for public comment? | <input checked="" type="checkbox"/> |
| Did you include the public comments you received on the NSP3 substantial amendment in your plan? | <input checked="" type="checkbox"/> |

7. NSP Information by Activity

| | Check all that apply |
|---|-------------------------------------|
| Did you include a description of all eligible NSP3 activities you plan to implement with your NSP3 award? | <input checked="" type="checkbox"/> |
| For each eligible NSP3 activity you plan to implement did you include: | |

| | |
|--|-------------------------------------|
| • Eligible use or uses? | <input checked="" type="checkbox"/> |
| • Correlated eligible CDBG activity or activities? | <input checked="" type="checkbox"/> |
| • Associated national objective? | <input checked="" type="checkbox"/> |
| • How the activity will address local market conditions? | <input checked="" type="checkbox"/> |
| • Range of interest rates (if any)? | <input checked="" type="checkbox"/> |
| • Duration or term of assistance? | <input checked="" type="checkbox"/> |
| • Tenure of beneficiaries (e.g. rental or homeowner)? | <input checked="" type="checkbox"/> |
| • If the activity produces housing, how the design of the activity will ensure continued affordability? | <input checked="" type="checkbox"/> |
| • How you will, to the maximum extent possible, provide for vicinity hiring? | <input checked="" type="checkbox"/> |
| • Procedures used to create affordable rental housing preferences? | <input checked="" type="checkbox"/> |
| • Areas of greatest need addressed by the activity or activities? | <input checked="" type="checkbox"/> |
| • Amount of funds budgeted for the activity? | <input checked="" type="checkbox"/> |
| • Appropriate performance measures for the activity (e.g. units of housing to be acquired, rehabilitated, or demolished for the income levels represented in DRGR) ? | <input checked="" type="checkbox"/> |
| • Expected start and end dates of the activity? | <input checked="" type="checkbox"/> |
| • Name and location of the entity that will carry out the activity? | <input checked="" type="checkbox"/> |

8. Certifications

| | Yes |
|---|-------------------------------------|
| Did you sign and submit the certification form applicable to your jurisdiction? | <input checked="" type="checkbox"/> |

9. Additional Documentation

| | Yes |
|----------------------------------|-------------------------------------|
| Did you include a signed SF-424? | <input checked="" type="checkbox"/> |

EXHIBIT A

**HENNEPIN COUNTY
NEIGHBORHOOD STABILIZATION PROGRAM 3 (NSP3)**

TARGET AREAS

HUD Mapping Tool Data and Maps

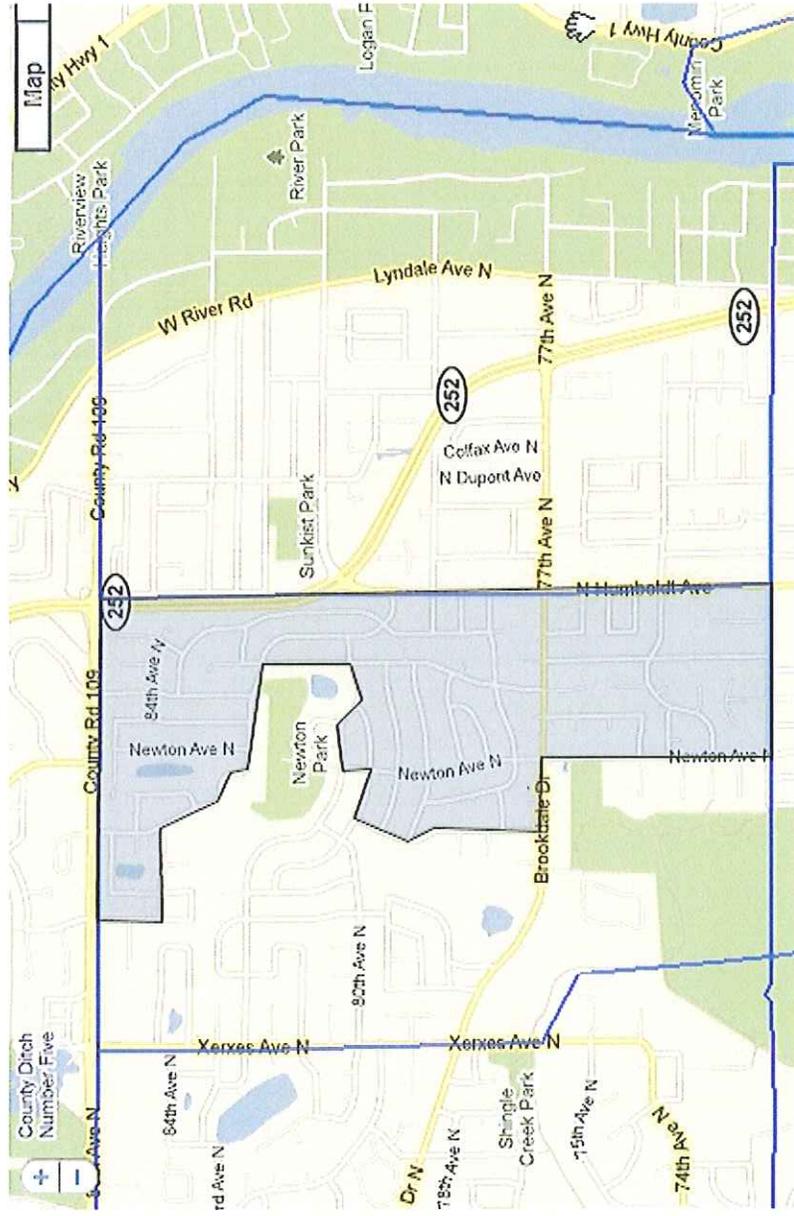
Brooklyn Park

Maps 1, 2, & 3

Brooklyn Center

Maps 1 & 2

NSP3 – HUD USER DATA MAPS



Brooklyn Park 1
Census Tract 268.14 Block Groups 1, 4 and 5

Neighborhood ID: 1229888

NSP3 Planning Data

Grantee ID: 2705300C

Grantee State: MN

Grantee Name: HENNEPIN COUNTY

Grantee Address:

Grantee Email: melanie.stratmoen@co.hennepin.mn.us

Neighborhood Name: Brookyn Park 1 Tier 1

Date:2011-01-18 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 20

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 1150

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 62.57

Percent Persons Less than 80% AMI: 26.13

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 1159

Residential Addresses Vacant 90 or more days (USPS, March 2010): 0

Residential Addresses NoStat (USPS, March 2010): 0

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 705

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 33

Percent of Housing Units 90 or more days delinquent or in foreclosure: 14.3

Number of Foreclosure Starts in past year: 72

Number of Housing Units Real Estate Owned July 2009 to June 2010: 41

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 14

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -17.4

Place (if place over 20,000) or county unemployment rate June 2005: 4.1

Place (if place over 20,000) or county unemployment rate June 2010: 6.9

'Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

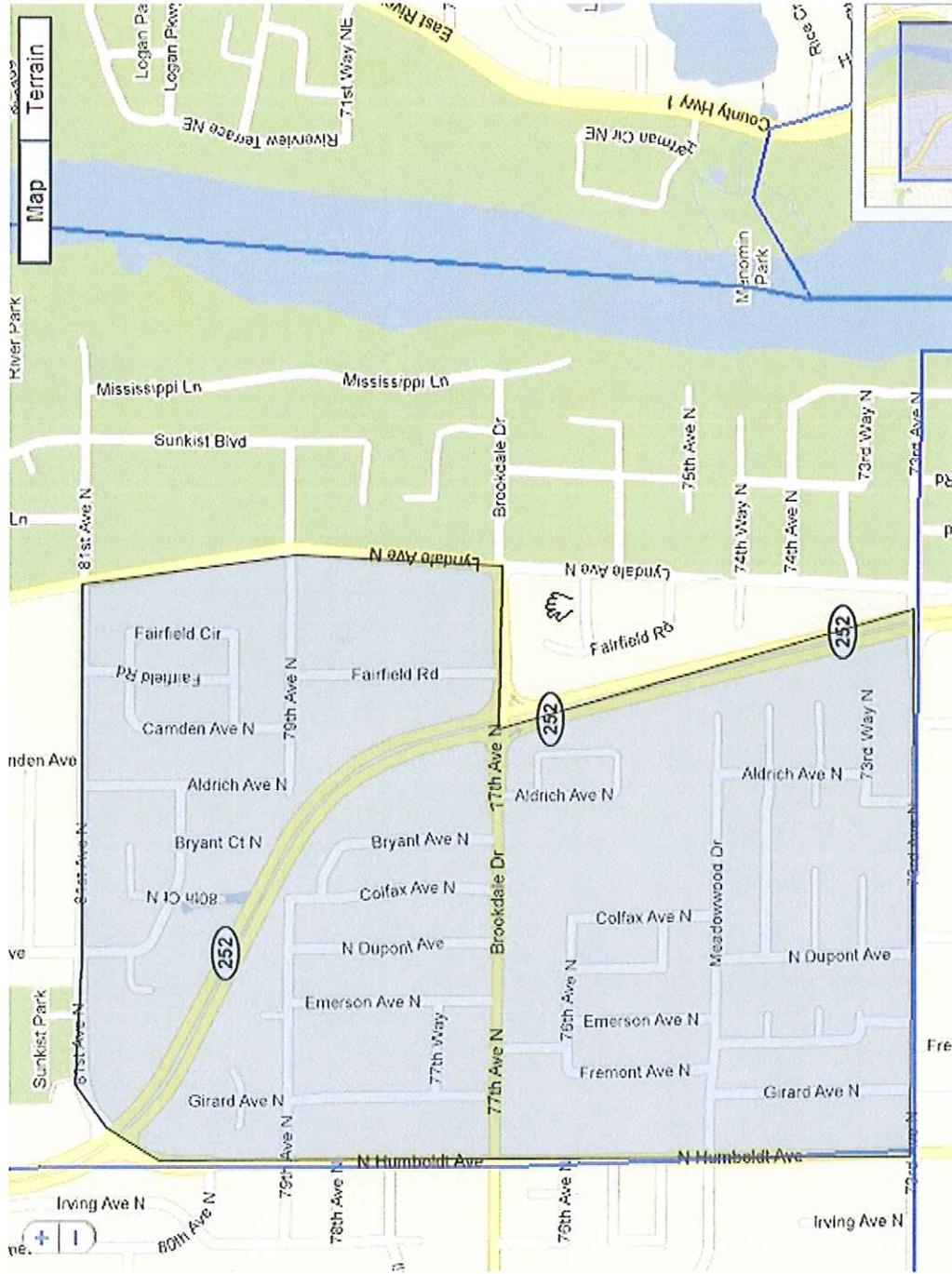
Latitude and Longitude of corner points

-93.301048 45.108605 -93.300362 45.087218 -93.308172 45.087218 -93.308172 45.094550 -93.311520
45.094610 -93.311348 45.098003 -93.311949 45.098851 -93.310919 45.100548 -93.308687 45.100003
-93.308773 45.100911 -93.306713 45.101093 -93.305597 45.100306 -93.303967 45.100669 -93.303967
45.103456 -93.308687 45.103941 -93.308859 45.104486 -93.310146 45.104910 -93.311348 45.106727
-93.315554 45.106667 -93.315468 45.108726

Blocks Comprising Target Neighborhood

270530268141000, 270530268141005, 270530268141007, 270530268141006, 270530268141004,
270530268141001, 270530268141002, 270530268141003, 270530268144000, 270530268144002,
270530268144004, 270530268144006, 270530268144008, 270530268144010, 270530268144011,
270530268144009, 270530268144007, 270530268144005, 270530268144003, 270530268144001,
270530268145000, 270530268145006, 270530268145019, 270530268145018, 270530268145017,
270530268145016, 270530268145015, 270530268145014, 270530268145013, 270530268145012,
270530268145011, 270530268145010, 270530268145009, 270530268145008, 270530268145007,
270530268145005, 270530268145001, 270530268145002, 270530268145003, 270530268145004,

NSP3 – HUD USER DATA MAPS



Brooklyn Park 2
Census Tract 268.15_Block Groups 2 and 3

Neighborhood ID: 3585357

NSP3 Planning Data

Grantee ID: 2705300C

Grantee State: MN

Grantee Name: HENNEPIN COUNTY

Grantee Address:

Grantee Email: melanie.stratmoen@co.hennepin.mn.us

Neighborhood Name: Brooklyn Park 2 Tier 1

Date:2011-01-18 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 19

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 811

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 73.87

Percent Persons Less than 80% AMI: 29.18

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 807

Residential Addresses Vacant 90 or more days (USPS, March 2010): 16

Residential Addresses NoStat (USPS, March 2010): 0

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 373

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 28

Percent of Housing Units 90 or more days delinquent or in foreclosure: 12.2

Number of Foreclosure Starts in past year: 32

Number of Housing Units Real Estate Owned July 2009 to June 2010: 18

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 7

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -17.4

Place (if place over 20,000) or county unemployment rate June 2005: 4.1

Place (if place over 20,000) or county unemployment rate June 2010: 6.9

Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-93.300533 45.087278 -93.287573 45.087218 -93.290405 45.094368 -93.286543 45.094307 -93.286285
45.097821 -93.286972 45.101517 -93.295727 45.101517 -93.298817 45.101638 -93.299847 45.101093
-93.300619 45.100184

Blocks Comprising Target Neighborhood

270530268152000, 270530268152005, 270530268152007, 270530268152010, 270530268152009,
270530268152008, 270530268152006, 270530268152004, 270530268152001, 270530268152002,
270530268152003, 270530268153000, 270530268153001, 270530268153002, 270530268153004,
270530268153006, 270530268153008, 270530268153010, 270530268153012, 270530268153015,
270530268153014, 270530268153013, 270530268153011, 270530268153009, 270530268153007,
270530268153005, 270530268153003,

Neighborhood ID: 6164123

NSP3 Planning Data

Grantee ID: 2705300C

Grantee State: MN

Grantee Name: HENNEPIN COUNTY

Grantee Address:

Grantee Email: melanie.stratmoen@co.hennepin.mn.us

Neighborhood Name: Brooklyn Park_3_Tier 1

Date:2011-01-18 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 20

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 475

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 73.26

Percent Persons Less than 80% AMI: 28.52

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 494

Residential Addresses Vacant 90 or more days (USPS, March 2010): 17

Residential Addresses NoStat (USPS, March 2010): 14

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 267

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 35.7

Percent of Housing Units 90 or more days delinquent or in foreclosure: 15.7

Number of Foreclosure Starts in past year: 30

Number of Housing Units Real Estate Owned July 2009 to June 2010: 17

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 6

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -17.4

Place (if place over 20,000) or county unemployment rate June 2005: 4.1

Place (if place over 20,000) or county unemployment rate June 2010: 6.9

*Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

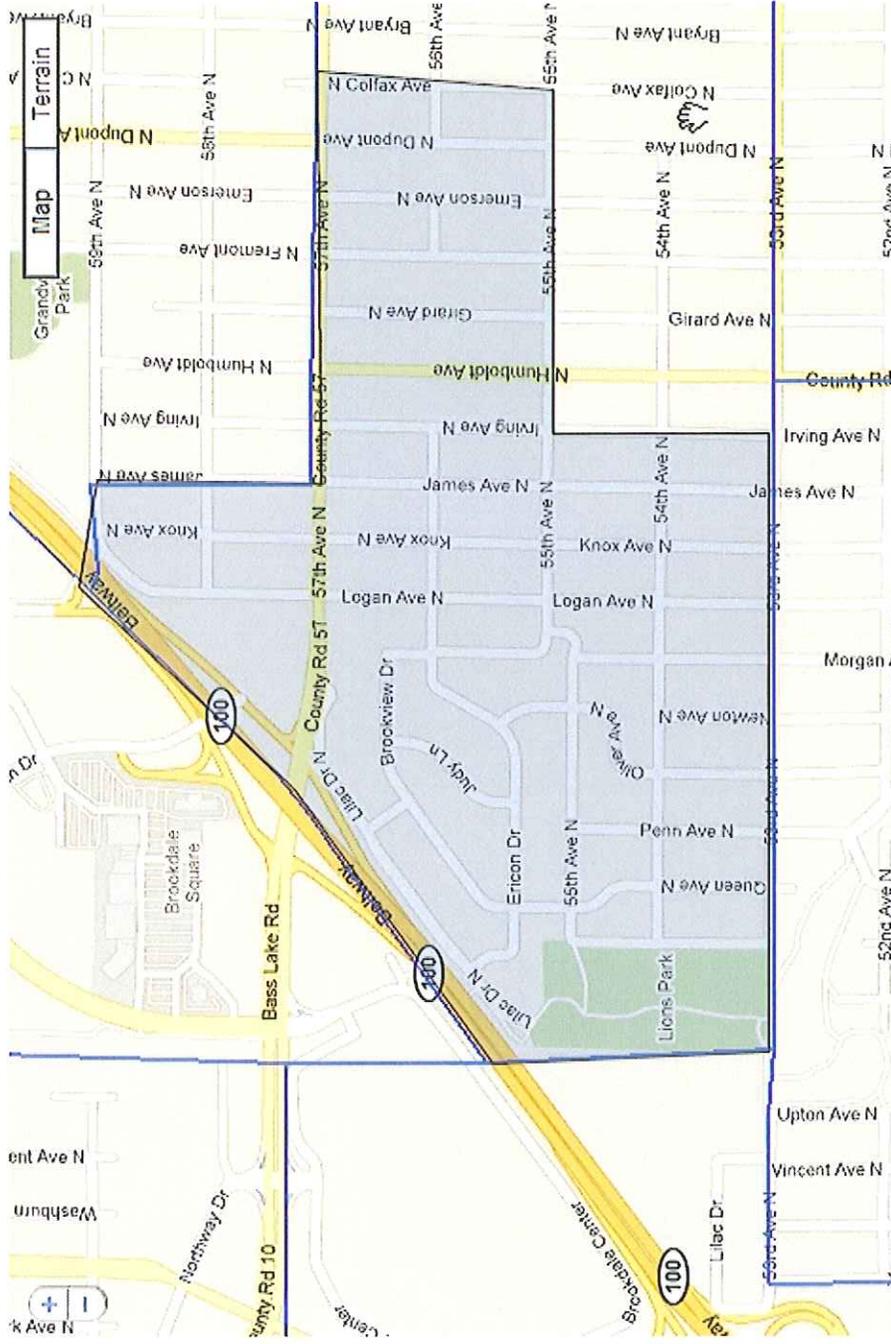
Latitude and Longitude of corner points

-93.356709 45.108726 -93.356624 45.098003 -93.359027 45.098094 -93.359070 45.099942 -93.358383
45.100366 -93.358727 45.100699 -93.358727 45.101123 -93.366709 45.101275 -93.366709 45.101699
-93.368683 45.101699 -93.369155 45.101396 -93.370099 45.101972 -93.371344 45.102274 -93.370399
45.103547 -93.369455 45.103850 -93.368297 45.103789 -93.366666 45.103819 -93.366065 45.104001
-93.365078 45.103819 -93.362331 45.103910 -93.361945 45.103850 -93.361559 45.104486 -93.361645
45.108817

Blocks Comprising Target Neighborhood

270530268164005, 270530268165000, 270530268165003, 270530268165005, 270530268165006,
270530268165004, 270530268165002, 270530268165001,

NSP3 – HUD USER DATA MAPS



Brooklyn Center /
Census Tract 205.00_Block Groups 2 and 3

Neighborhood ID: 6777160

NSP3 Planning Data

Grantee ID: 2705300C

Grantee State: MN

Grantee Name: HENNEPIN COUNTY

Grantee Address:

Grantee Email: melanie.stratmoen@co.hennepin.mn.us

Neighborhood Name: Brooklyn Center Tier 1

Date:2011-01-18 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 20

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 855

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 79.72

Percent Persons Less than 80% AMI: 49.25

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 855

Residential Addresses Vacant 90 or more days (USPS, March 2010): 39

Residential Addresses NoStat (USPS, March 2010): 3

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 421

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 31.8

Percent of Housing Units 90 or more days delinquent or in foreclosure: 14.3

Number of Foreclosure Starts in past year: 43

Number of Housing Units Real Estate Owned July 2009 to June 2010: 24

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 9

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -17.4

Place (if place over 20,000) or county unemployment rate June 2005: 4.7

Place (if place over 20,000) or county unemployment rate June 2010: 8.4

Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

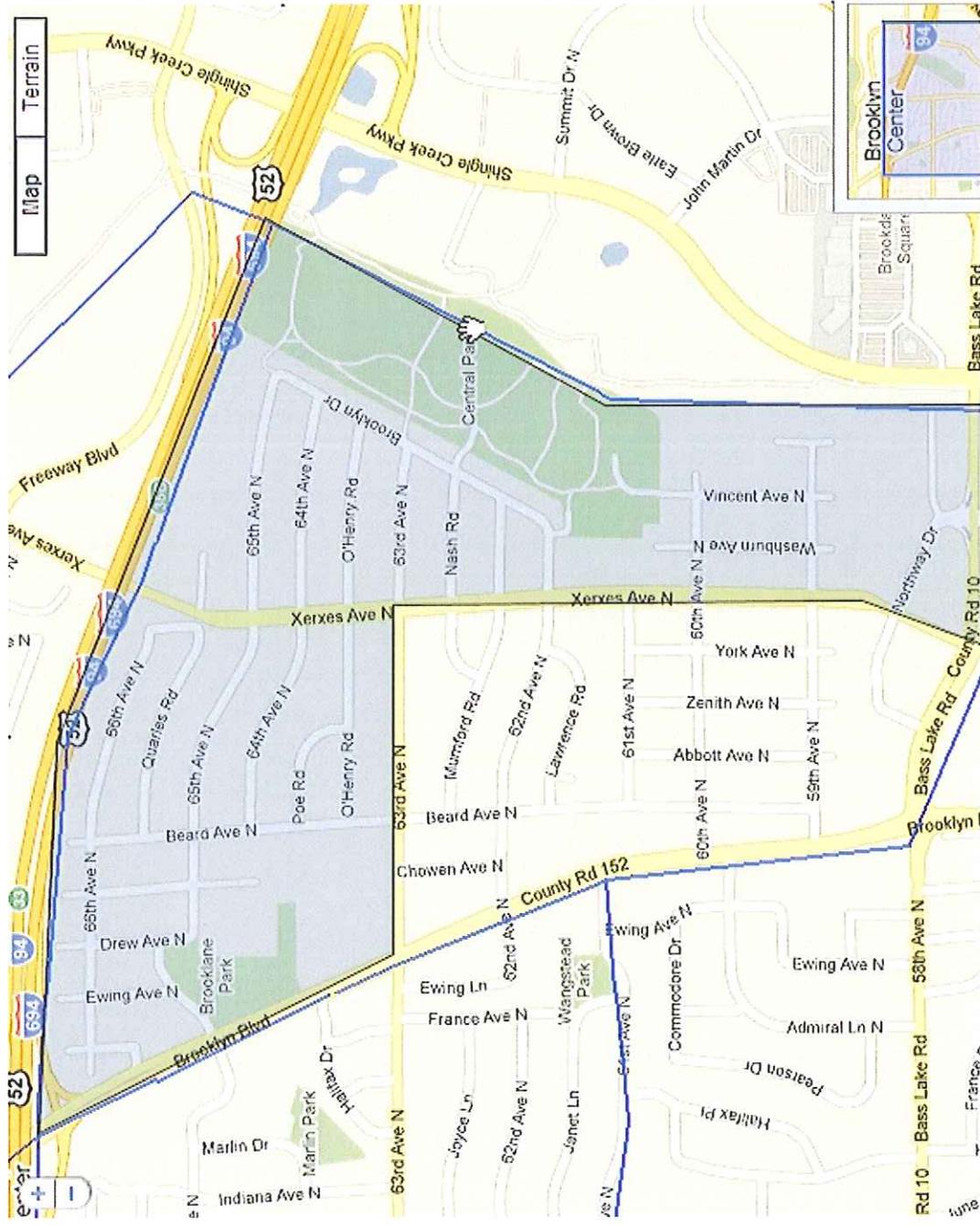
Latitude and Longitude of corner points

-93.314352 45.051271 -93.314610 45.055697 -93.308430 45.058850 -93.303881 45.062306 -93.301477
45.062003 -93.301563 45.058426 -93.292294 45.058486 -93.292723 45.054727 -93.300447 45.054727
-93.300447 45.051271

Blocks Comprising Target Neighborhood

270530205002000, 270530205002005, 270530205002007, 270530205002023, 270530205002022,
270530205002021, 270530205002020, 270530205002019, 270530205002018, 270530205002017,
270530205002016, 270530205002015, 270530205002014, 270530205002013, 270530205002012,
270530205002011, 270530205002010, 270530205002009, 270530205002008, 270530205002006,
270530205002004, 270530205002001, 270530205002002, 270530205002003, 270530205003000,
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270530205003017, 270530205003016, 270530205003015, 270530205003014, 270530205003013,
270530205003012, 270530205003011, 270530205003010, 270530205003009, 270530205003008,
270530205003006, 270530205003004, 270530205003001, 270530205003002, 270530205003003,

NSP3 – HUD USER DATA MAPS



Brooklyn Center
Census Tract 203.04_Block Groups 1 and 3

Neighborhood ID: 5003417

NSP3 Planning Data

Grantee ID: 2705300C

Grantee State: MN

Grantee Name: HENNEPIN COUNTY

Grantee Address:

Grantee Email: melanie.stratmoen@co.hennepin.mn.us

Neighborhood Name: Brooklyn Center 2 Tier 1

Date:2011-01-18 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 20

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 901

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 79.54

Percent Persons Less than 80% AMI: 53.05

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

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In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 899

Residential Addresses Vacant 90 or more days (USPS, March 2010): 79

Residential Addresses NoStat (USPS, March 2010): 0



Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 314

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 38.6

Percent of Housing Units 90 or more days delinquent or in foreclosure: 17.5

Number of Foreclosure Starts in past year: 40

Number of Housing Units Real Estate Owned July 2009 to June 2010: 22

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 8

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -17.4

Place (if place over 20,000) or county unemployment rate June 2005: 4.7

Place (if place over 20,000) or county unemployment rate June 2010: 8.4

*Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-93.327913 45.069399 -93.319330 45.069399 -93.319244 45.061215 -93.320446 45.058911 -93.314438
45.058972 -93.314438 45.065701 -93.309803 45.071642 -93.322678 45.075278 -93.332291 45.075581

Blocks Comprising Target Neighborhood

270530203041000, 270530203041005, 270530203041007, 270530203041014, 270530203041013,
270530203041012, 270530203041011, 270530203041010, 270530203041009, 270530203041008,
270530203041006, 270530203041004, 270530203041001, 270530203041002, 270530203041003,
270530203043000, 270530203043001, 270530203043002, 270530203043004, 270530203043006,
270530203043008, 270530203043010, 270530203043012, 270530203043016, 270530203043015,
270530203043014, 270530203043013, 270530203043011, 270530203043009, 270530203043007,
270530203043005, 270530203043003,

EXHIBIT B

**HENNEPIN COUNTY
NEIGHBORHOOD STABILIZATION PROGRAM 3 (NSP3)**

PUBLIC COMMENT LETTER AND RESPONSE



LEGAL AID SOCIETY OF MINNEAPOLIS
James E. Wilkinson ▪ ▪ jewilkinson@midmnlegal.org

January 31, 2011

Kevin Dockry, Senior Administrative Manager
Hennepin County Housing Community Works
and Transit Department
417 North Fifth Street, Suite 320
Minneapolis, MN 55401-1362

RE: 2010 Hennepin County Consortium Consolidated NSP Action Plan Amendment

Dear Mr. Dockry:

The Legal Aid Society of Minneapolis represents thousands of low-income elderly and disabled Hennepin County residents each year, many of whom live in or near the neighborhoods identified as having the greatest need for NSP interventions. These comments focus on ways that the Consortium and its partners may affirmatively further fair housing in the implementation of the NSP program. As a matter of good public policy and in order to comply with federal legal obligations, increased attention to this factor is needed.

Add Accessibility Goals: On pages 7 and 8 of the NSP Action Plan, the construction and rehabilitation standards applicable to the HOME Program are made applicable to housing projects assisted with NSP funding. Several of the standards are mandatory and others are encouraged. The final one, “the principles of universal design”, is an “encouraged” criterion. Universal design includes attention to the housing needs of persons with disabilities but does not have the specificity of the accessibility requirements set out by the Department of Housing and Urban Development and other standard-setting agencies. We understand that most of the NSP activity deals with single-family homes and that the strict accessibility requirements for multifamily housing are not directly translated to the rehabilitation of single-family homes. However, especially in projects involving nearly total reconstruction and for new construction, the Consortium should require that some low cost NSP-funded units be made accessible to individuals with mobility limitations. The Consortium would affirmatively further fair housing by adding this to the NSP program.

Increase Low-Income Set-Aside Amount Legal Aid’s clients are among the persons most directly affected by the housing market crisis in suburban Hennepin County. Typically their family incomes are well below the 50 percent area median income standard which is defined as low income for this program. The proposal allocates the minimum 25 percent of the funding for

low-income individuals. Hennepin County residents protected under federal and state fair housing laws, in particular families of color, new immigrants and persons with disabilities, are highly likely to have very low incomes. Increasing the NSP allocation to increase the amount aimed at low-income families would benefit the neediest and also address the Consortium's civil rights obligations.

Welcome All New Residents and Insist on Quality Management of Rentals: The Plan at page 9 states: "single-family rental requires additional City Council approvals." Some communities have not always welcomed new rental properties and the new residents who live there. We acknowledge that exploitative owners may present problems for both communities as a whole and for renters. Consortium members should welcome diverse populations in rental units while at the same time carefully regulating for quality management of this important resource. There are good models, locally and around the nation, which show how leaders can insure that both of these goals are achieved. See for example, Pratt and Allen, **Addressing Community Opposition to Affordable Housing Development: A Fair Housing Toolkit.** <http://www.knowledgeplex.org/showdoc.html?id=68549>

Affirmatively Market NSP-Assisted Housing: On pages 8 and 9 of the Action Plan, the Consortium sets out strategies relating to single-family home ownership and single-family rental projects. As those rehabilitated homes come back on the market, the owners and managers should adopt, implement and report back to the County on the results of their efforts to market those homes to persons least likely to apply in those neighborhoods. This will promote integrated communities and is another way to further fair housing. This office, Housing Link, and the Fair Housing Implementation Council have begun to develop an affirmative marketing best-practices tool kit which we will be pleased to make available to private and public partners participating in the NSP program.

Require Equal Housing Opportunity Policies: In addition to using affirmative market techniques to decrease segregation in housing, the Consortium should reinforce the civil rights obligations of its NSP housing provider partners. The affirmative fair housing obligation applicable to the Consortium is also a requirement of grantees. We suggest that this be done by asking that each provider, as a condition of participation, adopt an equal housing opportunity policy. A draft of such a policy is attached to this letter.

Include Integration and Opportunity as Criteria for Project Selection: The Consortium should adopt criteria to guide its selection of projects to address both sustainable community and desegregation goals. As the Consortium develops and implements criteria for selecting houses within the priority zones, it should consider the effect its choices will have on residential segregation patterns. Careful attention to this, if paired with effective affirmative marketing, should result in increased integration of the housing market. The Consortium should select single

family homes in high-opportunity areas, including those in proximity to jobs, transit, and good schools. By doing so, it will conform its NSP-3 efforts to the goals of the Regional Sustainable Community Planning Grant Program.

Preserve Existing Affordable Housing: Finally, we commend the Consortium's exploration of use of NSP money for preservation of the affordable housing at Shingle Creek Towers. The preservation of more than 100 units of affordable housing in an area already hit by the epidemic of mortgage foreclosures is a proper way to see that the housing needs of very low-income people are given attention. As stated above, these are likely to be disabled individuals, persons of color and new immigrants who either now live or will later reside in the Shingle Creek building and will thus contribute to the Consortium's compliance with its fair housing obligations.

Your consideration of these comments is greatly appreciated.

Sincerely yours,



James E. Wilkinson
Supervising Attorney

JEW:nb

Enclosure

cc: Tonja West-Hafner

Mark Hendrickson

1004-0290397--746172.docx

FOR STAFF AND OPERATIONS MANUAL

FAIR HOUSING AND EQUAL OPPORTUNITY POLICY



Owner has a strict policy to treat all customers and tenants with respect and to run our business as an equal opportunity provider. This is the law and our good business practice. We will deal fairly and equally with everyone. No-one will be denied services or treated differently because of:

- race,
- familial status (living with minor children),
- disability,
- color,
- national origin,
- ancestry,
- creed or religion,
- sex,
- sexual orientation,
- status with regard to public assistance,
- marital status,
- age.

Owner is also committed to providing reasonable accommodations in its policies and practices to people with disabilities.

Notice to all employees and agents of _____: If you violate equal opportunity laws you will face disciplinary action. The person responsible for making sure fair housing and equal opportunity laws are followed and responding to requests for reasonable accommodations is: _____, ph.: _____.

For more information see: <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>;
www.humanrights.state.mn.us and www.lawhelpmn.org

FOR CUSTOMERS AND POSTING

FAIR HOUSING AND EQUAL OPPORTUNITY POLICY



Owner has a strict policy to treat all customers and tenants with respect and to run our business as an equal opportunity provider. This is the law and our good business practice. We will deal fairly and equally with everyone. No-one will be denied services or treated differently because of:

- race,
- familial status (living with minor children),
- disability,
- color,
- national origin,
- ancestry,
- creed or religion,
- sex,
- sexual orientation,
- status with regard to public assistance
- marital status,
- age.

Owner is also committed to providing reasonable accommodations in its policies and practices to people with disabilities.

If you think you have been discriminated against contact: _____ (above) or:

The U.S. Department of Housing & Urban Development: 1-800-669-9777

The Minnesota Department of Human Rights: 1-800-657-3704, 651-296-5663

The Legal Aid Society of Minneapolis: 612-334-5970

You do not have to worry about retaliation.

For more information see: <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>;

www.humanrights.state.mn.us and www.lawhelpmn.org

FAIR HOUSING BUSINESS PRACTICES

- A. Policy Statement - Publish the statement that your organization offers equal opportunity housing and does not discriminate.
- B. Distribute orientation materials on and provide regular training in fair housing laws for all employees.
- C. Organizational Practices:
 - Give equal opportunity policy to employees, agents and residents
 - Maintain a list of fair housing resources and references
 - Use standardized application and selection criteria for applicants, such as those developed by the Corp. for Supportive Housing:
<http://tinyurl.com/CSHPolicies>
 - Give accurate and timely responses to all inquiries
 - Make reasonable accommodations for disabled persons, using an informed confidential procedure
 - Assign a leader to be responsible for fair housing complaint responses, training, implementation, including reasonable accommodation responses
 - Keep all advertising consistent with fair housing laws
 - Affirmatively market to persons least likely to apply
 - All rental agents must know about vacancies and terms for consistent treatment of applicants
 - Keep accurate record of all calls and walk-in interviews regarding rentals
 - Staff must be required to report cases of discrimination to superiors immediately
 - Assess fair housing knowledge and practices of staff in periodic personnel reviews.

D. How To Respond to A Complaint

1. When someone complains of discrimination, say that you take the complaint seriously and will look into the matter and respond to them. Complaints may be about employees or other tenants.
2. Take a detailed statement from the complaining party asking for a detailed description of the events. Ask about potential witnesses to this or similar events, getting names and contact information.
3. Follow up with a prompt investigation to determine whether a violation of policy occurred.
4. When discussing the allegations with the person against whom the complaint is made, tell them that discrimination and retaliation is not allowed and that you will be fairly investigating the allegation.
5. Document all information gathered in a confidential file.
6. If you are unable to verify a violation of the policy, place a summary of the complaint and results of the investigation in all parties' files.
7. If the investigation finds a violation of this policy, document the complaint and results of the investigation in both the complaining party's and the other person's tenant or employee files. You may wish to consult with a lawyer about your next steps.
8. In the case of a confirmed violation, use progressive disciplinary action up to and including termination or eviction if warranted because of ongoing or serious violations. For example, if the complaint involves an isolated incident or a single derogatory statement, you may use a stern warning that additional incidents could result in termination of tenancy or employment. If there was a highly offensive action or repeated violations of the equal housing policy, a notice to terminate tenancy or an immediate termination of employment may be appropriate. Actions to protect persons' safety may need to be addressed.
9. Inform the complaining party of the results of the investigation and, if the complaint was substantiated, tell them that specific actions have been taken with respect to the offending party. Discuss with them whether there are steps needed to remedy any injury they suffered.
10. If the complaint is not substantiated, or is not found to have been motivated by discrimination, address other causes of the dispute and consider referring to outside mediators or community dispute resolution resources.

This information is not legal advice; for legal advice about a particular situation, contact your attorney.

Housing Discrimination Law Project, The Legal Aid Society of Minneapolis

jewilkinson@midmnlegal.org January, 2011



Hennepin County Department of Housing, Community Works & Transit

417 North Fifth Street, Suite 320
Minneapolis, Minnesota 55401-1362

612-348-9260, Phone
612-348-9710, Fax
612-596-6985, TDD/TTY
www.hennepin.mn.us

February 18, 2011

Mr. James E. Wilkinson
Supervising Attorney
Legal Aid Society of Minneapolis
430 First Avenue North, Suite 300
Minneapolis, MN 55401-1780

RE: Substantial Change Amendment to the 2010 Urban Hennepin County Action Plan

Dear Mr. Wilkinson:

Thank you for commenting on the draft substantial change amendment to the 2010 Urban Hennepin County Action Plan, specifically the Community Development Block Grant program (CDBG). The purpose of the amendment is to implement the Neighborhood Stabilization Program 3 (NSP3) funded by the Department of Housing and Urban Development (HUD) in suburban Hennepin County. Late last year HUD notified the County that it was eligible to apply for NSP3 funding to address the impact of foreclosed, vacant or abandoned properties in defined areas of greatest need. Subsequently, the County was notified by Minnesota Housing that it is eligible to apply for a share of NSP3 funding to be awarded to the State.

Your comments and our response follow:

1) Add Accessibility Goals – especially in projects involving nearly total reconstruction and for new construction, the Consortium should require that some low-cost NSP-funded units be made accessible to individuals with mobility limitations.

Response: The provision of housing for persons/households with a physical disability is a high priority for Hennepin County under the Consolidated Plan FY2010-2014. The County primarily addresses the needs of physically disabled households by providing accessibility improvements for existing homeowners using CDBG and HOME funding, as well as through participation in the state of Minnesota Medical Assistance Home and Community Based Waiver Programs. During the last Consolidated Plan period (FY2005-2009) the County met its goal of providing accessibility improvements for 250 disabled homeowners. The County's goal under the current 5-year Plan (FY2010-2014) is to assist another 266 households.

While the County wholeheartedly encourages its development partners to include as many accessibility features as possible, requiring a fixed amount presents a number of challenges under the NSP3 program. Most notably 1) available housing stock; and 2) cost; and 3) resale cycle:

Housing Stock – at this time the County is unable to identify specific properties for acquisition. Based on previous NSP programs, the County anticipates that the majority of the homes available in the selected target neighborhoods will be multilevel splits typical of the 1970's and early 1980's. This type of housing stock does not cost-effectively lend itself to accessibility improvements. Restrictions on the type of housing stock pursued under NSP3 (i.e. single-story rambler) could significantly delay implementation and subject the funding to recapture under the program's expenditure guidelines.

Cost – due to cost constraints, rehabilitation activities under the NSP3 program are generally limited to code, energy, and life/safety improvements and certain cosmetic improvements to help speed future resale. These are not new construction or "nearly total reconstruction."

Resale - the County's primary goal under the NSP3 program is neighborhood stabilization through re-occupation of vacant and foreclosed housing units. The County's experience with for-sale accessible properties is that the sales cycle is longer and that, despite very diligent targeted marketing, the properties were ultimately sold to households that did not need the accessibility features or the features required significant adjustments to fit the buyer's specific needs.

In light of these concerns, the County has elected not to require accessibility requirements beyond the requirements of the NSP3 program. The County will continue its efforts to address the needs of physically disabled homeowners through the programs listed above.

2) Increase Low-Income Set-Aside Amount – The proposal allocates the minimum 25 percent of the funding for low-income individuals.

Response: Consistent with NSP3 regulations, Hennepin County has targeted the use of \$368,000 to serve households at or below 50 percent of area median income. NSP3 funding will be used for acquisition/rehabilitation/resale to owner occupants. Current economic conditions limit the number of eligible households within this income range with the capacity/interest in homeownership. There is nothing in the County's proposal that limits the County from exceeding this amount should the opportunity present itself. For example, the County has so far exceeded its requirement under NSP1 by over \$300,000 (equaling 29 percent of NSP1 funding).

As you are aware, the Hennepin County Board of Commissioners has been very supportive of affordable housing and routinely commits millions in local funding (i.e. Affordable Housing Incentive Fund, Transit Oriented Development) that serve households at or below 50 percent of area median income.

3) Welcome All New Residents and Insist on Quality Management of Rentals – The Plan states: "single-family rental requires additional City Council approvals."

Response: Hennepin County is supportive of all residents and I regret if there is anything in the County's NSP3 proposal which you interpreted to mean otherwise. The County's NSP3 proposal is homeownership based. While the County plan does not include rental activities, the proposal does identify possible rental strategies for future consideration should we experience difficulties implementing the original plan. These

strategies include financial assistance for Shingle Creek Towers (as applauded in your letter) and funding for special needs scattered site rental.

Because scattered site rental housing could include unrelated adults living in a supportive setting, and some municipalities may have requirements about the proximity of such housing types in relationship to other similar programs, the proposal also states "single family rental requires additional City Council approvals."

Since the possible location of scattered site units, if any, is unavailable at the time of this application, the County felt it prudent to disclose future actions that might be necessary. At this time the County does not expect any rental activity under NSP3.

For reference purposes, the County gladly agrees to forward to subrecipients a copy of Pratt and Allen, Addressing Community Opposition to Affordable Housing development: A Fair Housing Toolkit.

4) Affirmatively Market NSP-Assisted Housing – as rehabilitated homes come back on the market, the owners and managers should adopt, implement and report back to the County on the results of their efforts to market those homes to persons least likely to apply in those neighborhoods.

Response: Consistent with previous NSP programs, all NSP3-assisted homes require affirmative marketing (please see the attached Affirmative Marketing policy). Program subrecipients are required to sign the Affirmative Marketing policy and work with their development partners to create project-specific marketing plans. Marketing plans require County review and copies of all marketing material and tracking data required to be submitted to the County.

We would be happy to forward on to subrecipients any best practices tool kit developed by your office, Housing Link and the Fair Housing Implementation Council when available.

5) Require Fair Housing and Equal Opportunity Policies – We suggest that this be done by asking that each provider, as a condition of participation, adopt an equal housing opportunity policy.

Response: Thank you for the draft Fair Housing and Equal Opportunity Policy; the County will forward a copy of this material to NSP3 subrecipients for review and consideration.

Additionally, consistent with federal, state and local regulations for fair housing and equal opportunity, NSP subrecipients:

- In accordance with the Hennepin County Affirmative Action Policy and the Hennepin County Commissioners' Policies Against Discrimination, must agree that no person shall be excluded from full employment rights or participation in, or the benefits of, any program, service or activity on the grounds of race, color, creed, religion, age, sex, disability, marital status, sexual orientation, public assistance status, or national origin; and no person who is protected by applicable Federal or State laws against discrimination shall be otherwise subjected to discrimination.

- Must comply with Section 504 of the Rehabilitation Act of 1973, as amended, to ensure that no otherwise qualified individual with a handicap, as defined in Section 504, shall, solely by reason of his or her handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination by the subrecipient under Section 106 and/or Section 108 of the Housing and Community Development Act of 1974, as amended.
- Certify that it will affirmatively further fair housing within its jurisdiction.

6) Include Integration and Opportunity as criteria for Project Selection – As the Consortium develops and implements criteria for selecting houses within the priority zones, it should consider the effect its choices will have on residential segregation patterns.

Response: NSP3 requirements are highly prescriptive in their main criteria for property selection (i.e. must be located in an identified target area; must be foreclosed). By design, the target areas are fairly small to ensure a "neighborhood" impact. Additionally, the County and its subrecipients have no control over the supply of available properties. NSP3 funding must be expended within a limited window, which may limit the County and its subrecipients from being overly selective on acquisition sites. To the greatest extent possible the County and its subrecipients will consider the impact its NSP3 implementation will have on residential segregation patterns.

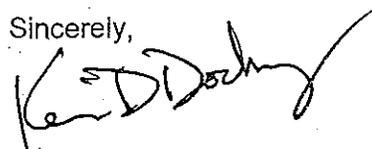
Selected target areas were chosen, in part, due to their proximity to transit and employment; all areas are within ½ mile of transit opportunities.

7) Preserve Existing Affordable Housing – We commend the Consortium's exploration of use of NSP money for preservation of the affordable housing at Shingle Creek Towers.

Response: The County is interested in a successful resolution to the issues surrounding Shingle Creek Towers. At this time the property is controlled by HUD. It will be up to the ability of a developer(s) to figure out how to make the project work both functionally and financially. The County looks forward to the opportunity to review proposals for a continued fit with County policies and priorities.

We appreciate your interest in NSP3 funds and the need to address the significant impact mortgage foreclosures are having in some of our communities and most vulnerable neighborhoods. A copy of the submitted substantial change amendment will be posted on the County website (www.hennepin.us/neighborhoodstabilizationprogram) on March 1, 2011.

Sincerely,



Kevin Dockry
 Manager
 Housing Development and Finance



**Hennepin Housing Consortium
HOME Investment Partnerships Program
AFFIRMATIVE MARKETING POLICY**



It is the policy of the Hennepin Housing Consortium, which includes Hennepin County, the City of Bloomington, City of Eden Prairie, the City of Minnetonka and the City of Plymouth, to provide fair housing opportunities regardless of race, color, religion, national origin, sex, familial status, status with regard to receipt of public assistance or disability. The Affirmative Marketing Policy incorporates fair housing marketing practices as addressed in Title VII of the Civil Rights Act of 1968.

In order to administer the HOME Program in conformity and to meet the requirements of the regulations at 24 CFR Part 92 92.351, the Hennepin Housing Consortium has established the following guidelines for HOME assisted rental and homebuyer projects:

I. Information to Owners, Tenants and Others

- A. Copies of the Affirmative Marketing Policy and a description of the existing fair housing laws shall be provided to all interested parties, including owners, their agents and tenants.
- B. All applicable fair housing laws, policies and procedures shall be discussed with and provided to owners and/or their agents to give to applicants as part of the screening process.
- C. The Equal Housing Opportunity Logo and/or equal opportunity language shall be included in all media announcements and advertisements, and conspicuously displayed in management offices or other appropriate places.
- D. Owners and/or their agents, tenants, and others shall be provided with the name and telephone number of a contact person if there are questions or concerns about the Affirmative Marketing Policy or other areas of the HOME Program. A TDD number will also be provided.
- E. Owners and/or their agents will be encouraged to keep on hand available copies of the Affirmative Marketing Policy to give to tenants or others upon request.
- F. The Equal Housing Opportunity Logo or language will be used in press releases and solicitations for owners, and written communications to fair housing and other groups.
- G. The Affirmative Marketing Policy may be published in other languages if it is deemed necessary.

II. Special Outreach

Owners and/or their agents shall be required to solicit applications for vacant units from persons in the housing market who are least likely to apply without special outreach efforts. In general, persons who are not of the race/ethnicity of the current residents in the neighborhood in which the project is located shall be considered least likely to apply. Efforts may include, but not be

limited to, the use of community organizations, churches, employment centers, housing counseling of referral agencies, the local housing authorities (HRAs), brochures, leaflets, signs, personal contacts, radio, newspapers (including neighborhood, city, and minority/ethnic newspapers or newsletters), local governmental offices, and advocacy or special needs groups.

III. Record Keeping

- A. Owners, and/or their agents shall maintain records of efforts made to affirmatively market units in order to assess their impact. Hennepin County, as Lead Agency for the Consortium, will maintain records. Records shall include information concerning race, ethnicity, gender of applicants and copies of efforts undertaken by Consortium members, owners, and/or their agents to attract tenants and the results of those who apply as well as any referrals received from other sources, i.e., community organizations, radio, newspapers, etc.
- B. Owners, and/or their agents shall maintain records such as copies of advertisements, letters or contacts with organizations, interviews with organizations, the media, prospective tenants, etc., public service announcements, and all other marketing efforts undertaken to rent units. The records may be inspected at any time it is deemed necessary, but no less than annually.
- C. Owners, and/or their agents shall maintain records on tenants and prospective tenants. The records will include race, ethnicity, income level and gender of tenants and prospective tenants when possible. These records must be made available upon request, but no less than annually.
- D. All records shall be maintained for the period of affordability as specified by the agreement between the owner and the Hennepin Housing Consortium.
- E. Hennepin County shall maintain current records for HOME assisted projects. Where possible, a separate Affirmative Marketing File should be set up for each HOME assisted project.

IV. Assessment of Marketing Efforts

Marketing efforts of owners shall be monitored by the Hennepin Housing Consortium, by comparing occupancy data before and after efforts are made. Flagrant or continued noncompliance with policies or regulations may result in sanctions being imposed, such as repayment of the loan or any other corrective action deemed necessary by the Hennepin Housing Consortium.

**Certification Receipt
for the
HENNEPIN HOUSING CONSORTIUM
AFFIRMATIVE MARKETING POLICY**

and Fair Housing and Equal Opportunity Guidelines/Regulations, Booklets, Posters,
and/or Logos

I, _____ of _____
(Name of person responsible for program) (Name of organization receiving HOME funds)

hereby certify that I have received the above mentioned documents and/or materials.

Organization

By: _____
(Authorized signature)

Title: _____

Date: _____

EXHIBIT C

**HENNEPIN COUNTY
NEIGHBORHOOD STABILIZATION PROGRAM 3 (NSP3)**

CITIZEN PARTICIPATION PROCESS DOCUMENTATION

AFFIDAVIT OF PUBLICATION

STATE OF MINNESOTA)
COUNTY OF HENNEPIN) (SS.

Cathy Skor, being duly sworn on oath say she/he is and during all times herein stated has been the publisher or the publisher's designated agent in charge of the newspaper known as

Official Publication HENNEPIN COUNTY

PUBLIC COMMENT SOLICITED

(Published in Finance and Commerce January 14, 2011)

Hennepin County is soliciting public comment for 15 days from January 18 to February 1, 2011 on a proposed amendment to the 2010 Hennepin County Consortium Consolidated Action Plan...

The draft Amendment will be available on the county web site at www.hennepin.us

The Hennepin County Board of Commissioners will consider approval of the amendment to the Plan at its February 1, 2011 Public Works, Energy & Environment Committee meeting...

If you have questions about the amendment, please contact Kevin Dockry at 612-348-2270.

This material can be provided to you in different forms on request, such as large print, if you call 612-348-9260. 22266938

FINANCE AND COMMERCE

and has full knowledge of the facts herein stated as follows:

- (A) The newspaper has complied with all of the requirements constituting qualifications as a legal newspaper... (B) She/He further states on oath that the printed

Official Publication 22266938

hereto attached as part hereof was cut from the columns of said newspaper, and was printed and published therein in the English language; that it was first so published on

January 14, 2011 for 1 times(s);

the subsequent dates of publications being as follows:

And that the following is a printed copy of the lower case alphabet from A to Z, both inclusive, and is hereby acknowledged as being the size and kind of type used in the composition and publication of said notice, to wit:

[Handwritten signature]

X abcdefghijklmnopqrstuvwxyz abcdefghijklmnopqrstuvwxyz

Subscribed and Sworn to before me this 14th day of January, 2011

[Handwritten signature] Notary Public, Hennepin County, Minnesota



RATE INFORMATION:

- 1. Lowest classified rate paid by commercial users for comparable space: 3.25000
2. Maximum rate allowed by law for the above matter: 0.67100
3. Rate actually charged for the above matter: 0.61000

NSP Reporting

Also Found In...

Programs

Programs

Neighborhood Stabilization Program (NSP)

SHARE

Related Links

Minnesota Sustainable Design Guide

Energy Star

The Center for Universal Design

Contact

Housing, Community Works and Transit HCWT

E-Mail

Phone: 612-543-0046

FAX: 612-348-2920

8:00-4:30

Location:

417 North 5th Street

Suite 320

Minneapolis, MN

55401

Map It!

The Neighborhood Stabilization Program (NSP) was established by the U.S. Department of Housing and Urban Development (HUD) for the purpose of stabilizing communities that have suffered from foreclosures and abandonment.

NSP3

The NSP funds authorized under the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) of 2010, provides a third round of neighborhood stabilization grants to all states and select governments on a formula basis.

Public Comment

Hennepin County is soliciting public comment for 15 days from January 18 to February 1, 2011 on a proposed amendment to the 2010 Hennepin County Consortium Consolidated Action Plan. The amendment will allocate \$1,469,133 from federal HUD Community Development Grant (CDBG) Neighborhood Stabilization Program 3 (NSP3) funds to Hennepin County.

This amendment is considered a "substantial change" to a previously approved Consolidated Plan and is subject to citizen participation requirements governing amendments to the Plan.

The Hennepin County Board of Commissioners will consider approval of the amendment to the Plan at its February 1, 2011 Public Works, Energy and Environment Committee meeting and will take final action on the amendment at its February 8, 2011 meeting. Written comments must be received by February 1, 2011. Comments to Hennepin County should be submitted to Kevin Dockry, Housing Development and Finance, Hennepin County Housing, Community Works and Transit Department, 417 North 5th Street, Suite 320, Minneapolis, MN 55401.

- NSP3 Substantial Amendment Public Comment Draft
- HUD maps and data sets
- HOME Program Construction and Rehab Standards

NSP2

The NSP funds authorized under the American Recovery and Reinvestment Act (the Recovery Act) of 2009, provides grants to states, local governments, nonprofits and a consortium of nonprofit entities on a competitive basis.

Read more about NSP2 funding.

NSP1

The NSP funds authorized under Division B, Title II of the Housing and Economic Recovery Act (HERA) of 2008, provides grants to all states and selected local governments on a formula basis.

NSP1 cities and/or their development partners have homes available for purchase. The homes have buyer assistance attached to them under a separate budget.

Additional information on the NSP funded properties is available:



**Public Comment Solicited on 2010 Hennepin County Consortium
Consolidated Action Plan Amendment**

Melanie A. Stratmoen to:

01/19/2011 10:51 AM

Cc: Kevin D Dockry, James M. Ford, Mark Hendrickson, Tonja K
West-Hafner

Bcc: bethk, resource, alan.arthur, alliancehousing, barbmquillan,
Benadiri, byron.laher, ccarey, cdavids, cgobrien, chalbach, clentz,
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jewilkinson, JFCS, jmanworren, joan.white, jodi, jss, judy,
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mbjerk, mmorris, mrippe, mroehl, MWEBER, novak, pfate, plamb,
ramona.wilson, rharris, rmodrow, rzierdt, sjuetten, steve.cramer,
susan.haigh, susanneis, svanderschaaf, t.fuller, terry, tim, tstreitz,
tthompson, wwiegmann

The Hennepin County Consortium, comprised of all suburban Hennepin County communities, is soliciting public comment on a proposed amendment to the Hennepin County Consortium Consolidated Action Plan. The amendment will allocate \$1,469,133 in federal HUD Community Development Block Grant (CDBG) Neighborhood Stabilization Program 3 (NSP3) funds to Hennepin County. This program was authorized under the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) of 2010, and provides a third round of neighborhood stabilization grants to assist in the redevelopment of abandoned and foreclosed homes. The Hennepin County Consortium's amendment is considered a "substantial change" to the previously approved 2010 Consolidated Action Plan and is subject to citizen participation requirements governing amendments to the plan.

The draft Amendment will be available on the county web site at www.hennepin.us (search – "NSP" or "2010 Action Plan Amendment") on January 18. If you would like a paper copy of the draft amendment or have questions, please contact Housing, Community Works and Transit Department at 612-348-9260.

The Hennepin County Board of Commissioners will consider approval of the amendment to the Plan at its February 1, 2011 Public Works, Energy & Environment Committee meeting and will take final action on the amendment at its February 8, 2011 meeting.

Written comments may be submitted during the 15-day public comment period, **January 18 to February 1, 2011**. Written comments should be addressed to Kevin Dockry, Senior Administrative Manager, Hennepin County Housing, Community Works and Transit Department, 417 North Fifth Street, Suite 320, Minneapolis, MN 55401-1362. All comments received by February 1, 2011 will receive a written response. A copy of the comment letter and the county's response will be included in the application submitted to the U.S. Department of Housing and Urban Development on or about March 1, 2011.

This material can be provided to you in different forms on request, such as large print, if you call 612-348-9260.

Melanie Stratmoen
Hennepin County Housing, Community Works and Transit
Department of Transit and Community Works
417 N 5th Street, Suite 320
Mpls, MN 55401
612-348-2216

Hennepin County, Minnesota

RESOLUTION NO. 11-0030

[2011]



www.hennepin.us

The following Resolution was offered by Public Works, Energy & Environment Committee:

BE IT RESOLVED, That an amendment to the Hennepin County Consortium 2010 Consolidated Plan to receive a special funding award in the amount of \$1,469,133 from the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG) - Neighborhood Stabilization Program 3 (NSP3) be approved; that use of up to 10 percent of the funds made available from the NSP3 Program for necessary program administration be approved; that the substantial amendment be submitted to the U.S. Department of Housing and Urban Development (HUD); that the County Administrator be authorized to execute the 2010 NSP3/CDBG funding agreements with HUD; that the Chair of the Board be authorized to execute recipient funding agreements and other necessary documents; and that the Controller be authorized to disburse such funds as directed.

The question was on the adoption of the resolution and there were 6 YEAS and 0 NAYS, as follows:

| County of Hennepin Board of County Commissioners | YEAS | NAYS | ABSTAIN | ABSENT |
|---|------|------|---------|--------|
| Mike Opat | X | | | |
| Mark Stenglein | X | | | |
| Gail Dorfman | X | | | |
| Peter McLaughlin | X | | | |
| Randy Johnson | X | | | |
| Jan Callison | | | | X |
| Jeff Johnson | X | | | |

RESOLUTION ADOPTED ON 2/8/2011

ATTEST:

Deputy/Clerk to the County Board

Hennepin County Board Action Request (continued)



| | |
|--|--|
| Requesting Department | Housing Community Works Transit |
| Recommendation from County Administrator | Recommend Approval |
| Committee Assignment | Public Works, Energy & Environment Committee |

Background

History: Hennepin County, as the lead agency of the Urban Hennepin County Community Development Block Grant (CDBG) Program, has received an allocation of \$1,469,133 from the U.S. Department of Housing and Urban Development (HUD) under the new Neighborhood Stabilization Program 3 (NSP3). This program is authorized under the Wall Street Reform and Consumer Protection Act of 2010 (Frank-Dodd Act of 2010), Notice 75 FR 64322 of October 19, 2010, and represents a third round of funding to provide targeted emergency assistance to local governments to acquire, redevelop or demolish foreclosed properties.

To date, there have been two other rounds of NSP funding, in which Hennepin County was named grantee: \$8.6 million in NSP1 funding under the Housing and Economic Recovery Act of 2008 (HERA); \$1.69 million in NSP 2 funding under the American Recovery and Reinvestment Act of 2009 (ARRA).

To receive its NSP3 grant allocation, Hennepin County must submit an NSP3 application to HUD by March 1, 2011. The NSP3 application requires an amendment to the Hennepin County Consortium 2010 Action Plan (Resolution 10-0214 approved May 25, 2010), affirmation of the County's commitment to further fair housing, and certifications relative to submittal and compliance with federal laws and regulations.

As part of the NSP3 allocation process, HUD has calculated a Foreclosure Need Index Score (a score from 1 to 20, with 20 considered highest need, based on a) the number and percentage of home foreclosures, b) the number and percentage of homes financed by a subprime mortgage, and c.) the number and percentage of homes in default or delinquency), for all Suburban Hennepin County census tract block groups.

Based on the HUD Foreclosure Need Index Score, the highest need suburban areas are concentrated in the cities of Brooklyn Center and Brooklyn Park (the first 64 high need block groups are located in these cities).

HUD recommends grantees select target areas small enough so that at least 20 percent of the real estate owned (REO) properties in the target area receive assistance; based on discussions with city staff and a review of city vacancy data, the County has narrowed the NSP3 target areas to the following census tracts (see also Exhibit 1):

- Brooklyn Center 202.00 Block Group 3
- Brooklyn Center 203.04 Block Groups 1-3
- Brooklyn Center 205.00 Block Groups 1-3
- Brooklyn Center 206.00 Block Groups 1-2
- Brooklyn Park 268.14 Block Groups 1-5
- Brooklyn Park 268.15 Block Groups 2-3
- Brooklyn Park 268.16 Block Groups 1-5
- Brooklyn Park 268.18 Block Group 3

Hennepin County will use city subrecipients and developers to implement the NSP3 Program. All NSP3 funding must assist households at or below 120 percent of area median income (AMI); 25 percent of the

funding must assist households at or below 50 percent of AMI. Consistent with federal regulations, NSP3 funds will be used to purchase and rehabilitate vacant or foreclosed properties (developer financing for acquisition/rehabilitation; development/permanent financing for single-family rental; development financing for multi-family rental). Coordinating with a potential award from Minnesota Housing of an additional \$950,000 in NSP3 funding, it is estimated that approximately 45 properties will be addressed under the program (see Exhibit 2).

A copy of the substantial amendment to the 2010 Consolidated Plan (NSP3 amendment) is located on the Hennepin County website at www.hennepin.us/neighborhoodstabilizationprogram. In addition, the Housing, Community Works and Transit Department published the required legal notice for a 15-day public comment period (January 18 – February 1, 2011) in Finance and Commerce on January 14, 2011 and electronic notice was sent to individuals on the public comment mailing list on January 18, 2011.

Current Request: This request is for approval of a substantial amendment to the Hennepin County 2010 Consortium Consolidated Plan.

Impact/Outcomes: Approval to amend the Hennepin County Consortium 2010 Consolidated Plan will allow Hennepin County to receive special funding in the amount of \$1,469,133 from the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG) - Neighborhood Stabilization Program (NSP3).

The PID # is CON000000000044.

Approvals

| | | | |
|--------------------------------|--------------------|------|-----------|
| Department Head | Eckhert, Philip C. | Date | 1/7/2011 |
| Deputy/Assistant Administrator | Nookala, Marthand | Date | 1/13/2011 |
| County Administrator | Booth, Melissa | Date | 1/24/2011 |