#### PUBLIC COMMENT

The NSP Substantial Amendment was prepared with significant citizen participation.

A press release was issued on September 26, 2008, the day we learned of the allocation. A copy of the release is enclosed.

The requirements of the program were explained at a public meeting, the Third District Council Meeting on October 13, 2008.

A website was established on October 17, 2008. Information regarding the program was made available on the website.

http://www.kcmo.org/neigh.nsf/web/HUDNSP?opendocument

Requirements of the program were presented at a city council housing committee hearing on October 22, 2008. These hearings was televised live and repeated during the week. There is also video footage of the hearing available through the website of the City Clerk for viewing at any time.

A copy of the first draft of the Substantial Amendment was posted on the website on October 29, 2008. Many of the suggestions and comments that had been received were included in this draft.

The draft of the Substantial Amendment was presented at the city council housing committee hearing on October 29, 2008. At least 13 people provided public testimony. The enclosed summary of public comments summarizes their testimony.

A second draft was prepared and included revisions based upon testimony received at the October 29, 2008 city council hearing. A press release was issued on November 3, 2008, announcing that public comment was being sought on the Substantial Amendment. The second draft was posted on the website on November 4, 2008.

The second draft was presented at the city council housing committee hearing on November 5, 2008. Nine people provided testimony at this hearing. Their comments and suggestions are included in the enclosed summary of public comments. The city council adopted Resolution 081110, which authorized the submittal of the NSP Substantial Amendment.

The final draft of the Substantial Amendment was posted on the website on November 6, 2008. This summary was prepared on November 26, 2008. The Substantial Amendment was therefore available for public comment for a 20-day period.

10/29/2008 William Jones, Swope Community Builders

Mr. Jones suggested including short-term rental with option to purchase. Also that we should leverage financing, and include non-profit and small for-profit developers. An estimate of \$2,000 per property acquisition in the land bank activity is too low.

10/29/2008 Chester Thompson, Black Economic Union

Mr. Thompson said plans should align with redevelopment plans and Section 3 needs to be included.

10/29/2008 Tamika Bryant

Ms Bryant said there needs to be extensive marketing to ensure we locate buyers for renovated houses.

10/29/2008 Robert Stout, East 23rd Street PAC

Mr. Stout said the neighborhood needs homeowners, not absentee owners.

10/29/2008 Mindy Forbes

Credit counseling is needed for program participants.

10/29/2008 Jerry Mitchell, Ruskin

Wanted to see an expanded target area for the land banking activity.

10/29/2008 Kathryn Walker, Westside Housing Organization

Suggested we reconsider the 35% level (it was reduced to 25% of 50% AMI) and involve urban homesteading and use of the abandoned housing act. She said there will need to be a method of ensuring accountability of developers.

10/29/2008 Herman Johnson

Said there needs to be minimum standards for rehab to ensure quality construction and there needs to be MBE/WBE participation.

10/29/2008 Charlie Cyshel

The \$2,000 per property for acquisition in the land banking activity is too low. Any "soft seconds" that are included should be made available to mortgage brokers too. He said to be careful with demolition and to involve smaller non-profits and for-profits that already work in the area.

10/29/2008 Margaret May, Ivanhoe Neighborhood Council

Suggested we develop a strategic approach and work with the neighborhood on demolitions. She said we should utilize minority contractors and area residents. There should be incentives for city workers, teachers, police, etc. and for people of other income levels to move into the central city. She suggested a task force be established.

She said there needs to be a carefully structured lease-purchase program for folks who may not be able to qualify for a mortgage right away.

10/29/2008 Twelfth Street Heritage

Funds for maintenance of land banked properties was too low. The budget needed to be examined.

10/29/2008 Ron Lindsey, Concord Church

Mr. Lindsey sadi they are a CDC that wants to participate.

10/29/2008 Sharon Sanders-Brooks

Said the funds should be limited to persons below 80% of AMI. Don't go up to 120% even though it is allowable.

10/30/2008 Mike Barnhart

I viewed the October 22nd Housing Committee meeting online a couple of days ago and was intrigued by the land bank concept. Visiting Genesee Counties Land Bank website shows how successful that concept can be. I attended yesterday's meeting. Among the many great comments and ideas, Mendy Read-Forbs made a public comment about using this federal money as a way of "assisting" prospective homebuyers who would also seek third party financing by more traditional means.

As a traditional developer, that usually markets lots and new construction to potential homebuyers, I have an idea for this project that might be new to the table.

Imagine a land bank similar to the one in Genesee County that markets their inventory very much like a new home subdivision would. Marketing materials and the land banks website would present each "project house" as you would a model.

The buyer could see the floor plan, the exterior details, the lot and the neighborhood of the "project house". They would also be able to see what a completed project looks like. A realtor would then set up a meeting with a builder (refurbisher) so the buyer could select a home, choose the flooring, paint colors a few other details. The builder would work up a sale price and if accepted the buyer and realtor would utilize all of the available assistance to get the property under contract.

Buying a "classic" refurbished home through the land bank could be just as exciting and interactive as buying a new home from a developer. But it must be presented in an exciting and professional manner.

This just might be a way to turn a six million dollar program into a 25 million dollar program.

I represent Cedarwood Homes <u>www.cedarwoodhomes.net</u>, an experienced (licensed in Kansas City) homebuilding and development company. We'd love to be involved any way we can.

11/1/2008 Florina Bee

Ms Bee was very disappointed in the plan. She said the way of dealing with foreclosures in the "weak market" areas seems to only consist of demolishing buildings. She felt we should focus more on rehabilitating houses.

11/3/2008 East 23rd St. PAC/Blue Valley Neighborhood/Truman Road Corridor

The three associations provided a written proposal to use the funds to establish a \$1 million reserve fund to leverage investments for owner occupied homes to be rehabilitated. It calls for organizations active in the area to use the funds for rehabilitation of foreclosed homes. The proposal provided documentation on the need for such a program in the described area. The funds would essentially be used to provide acquisition and renovation financing - either directly as loans or as guarantee for private loans.

11/3/2008 April Cushing, Ruskin Heights

Ms Cushing reported that Ruskin Village and Ruskin Heights have 250 vacant houses out of 1,875 properties. Ruskin Hills has 100 out of 749. The information was reported to document the need for NSP funds in the area - the neighborhoods are included in the target area.

11/3/2008 Sue Svec

Ms. Svec commends the City for seeking funding through the NSP and agrees that there is a need for the program in Kansas City. She complimented Blue Hills Neighborhood and Ivanhoe Neighborhood associations in how they work to improve their areas and said they could serve as role models.

11/3/2008 S.M. Merritt

Ms Merritt said the funds should be used to replace sewer lines in Armour Hills, especially east of Wornall and between 65th and 65th Terr. She said the old sewer lines are caving in and damaging garages and other structures.

11/3/2008 Ron Heldstab, Lykins Neighborhood

Mr. Heldstab provided a list of 19 houes in the neighborhood that may qualify for the program.

11/4/2008 Martin Goedken, Catholic Charities

Mr. Goedken, Michael Halterman, and Susan Engel of Catholic Charities of Kansas City - St. Joseph, met with David Park to learn more about the NSP. They believe their organization will be able to assist with accomplishing the objectives of the program.

11/4/2008 Josh Christophersen

He lives in the Independence Plaza neighborhood, which is included in the target area, and agrees there is a need for the program. He said a good start would be the demolition of apartment buildings on Chestnut, between 9th and 11th.

11/4/2008 Ms. S. Hill

Ms Hill said the NSP funds are definitely needed, but asked us to ensure houses that are not in areas with organized neighborhood associations are not left out. There is a feeling that funds typically go to preferred neighborhood associations but there are needs outside those areas too.

11/4/2008 Elma Warrick, HomeFree-USA Kansas City

After reviewing the proposed plan for use of the NSP funds, I am concerned that there is no mention of plans to stabilize people providing them the opportunity to successfully purchase the rehabilitated or redeveloped properties. Neighborhoods are stabilized by the residents who live in those neighborhoods. Certainly renters are a part of the mix, but have little stake in stabilizing neighborhoods as this population tends to be transitory.

While there is mention of the fact that the funds cannot be used for foreclosure prevention, there is clear language in bill that calls for home buyer counseling and education. The City should state forthrightly that it intends to provide support for prospective home buyers to receive the home buyer pre and post purchase counseling and education. While the details of those services can be defined more clearly going forward, there needs to be an intention of the City to have a process in place that will promote success for neighborhood residents. At minimum, the services must include credit counseling, debt reduction techniques that work, budgeting and savings. The City must avoid setting people up to fail. Data has shown that 98% of persons losing their homes to foreclosure never sought assistance, guidance or support from HUD approved Housing Counseling Organizations. Rather than speaking to what is not allowed. I urge the City to include what is allowed in our plan--housing counseling and education.

11/5/2008 Steve Rinne, Homeless Services Coalition

The Homeless Services Coalition should be included in the HUD application. The HSC and member organizations can fully vet the clients to ensure appropriate candidates are selected to maximize the effectiveness of this program.

11/5/2008 Yahna Gibson, Habitat for Humanity

Ms. Gibson pointed out the history and success of Habitat for Humanity, Kansas City. They are interested in obtaining funding to further our common goals.

11/6/2008 ABG Properties, LLC

The Ballesteros of ABG Properties, LLC, say they own seven rehabilitated homes in Kansas City. They suggest using the funds to make loans to investors for purchase and

rehabilitation of inner city properties at a low interest rate. Once the renovation is complete, a conventional mortgate would be obtained and the NSP loan paid off. This will allow for the funds to be an ongoing financing resource. They have had trouble finding this kind of financing. They get calls all the time wondering when they will have another house available so they know there is a pent up demand for quality rental housing. They also said some funds should be used to tear down blighted properties that are beyond repair, then finance an investor to build a new house on the lot.

#### 11/7/2008 Mike Barnhart, Cedarwood Homes, LLC

Mr. Barnhart said it will be hard to get builders or developers interested in taking on a project for less than a 14% return. Not allowing a reasonable return can have a negative impact on quality of workmanship and length of time to complete a project.

#### 11/10/2008 Forestine Beasley

As President of the Greater Kansas City Association of Real Estate Brokers, Ms Beasley said the association can assist with implementation of the NSP. She also said city employees should be considered a good source for buyers of acquired and renovated homes.

#### 11/10/2008 Larry Goldblatt

Comments were also presented at the Housing Committee hearing on November 5. Mr. Goldblatt recommends placing all of the NSP funds in a trust and using the income from the trust to carry out program activities. He proposes contracting with the "Office of the Public Advocate", a business he operates, to administer the program.

#### 11/11/2008 Greg Atkinson

Mr. Atkinson said Northeast KC Youth Services purchased a foreclosed home on E. 7th St. to use as a ministry site. They will be renovating it and using it with neighborhood youth and families. They would be interested in participating in the NSP to purchase and rehab another property for a low-income family.

#### 11/11/2008 Tom Herrara

Mr. Herrera is a mortgage professional and has experience originating FHA, USDA, Conventional and VA loans. He volunteered to offer ideas on how to effectively use the NSP funds.

#### 11/13/2008 Rick Shirk, Rick's Home Inspections

Mr. Shirk suggested that we involve home inspections for houses that may be acquired with NSP funds.

#### 11/24/2008 Kenneth B. Mabrie

Mr. Mabrie recommends that we buy REO properties listed on the MLS. The properties are already discounted by 15% under appraised value. He said there are currently 339

properties listed under \$25,000. He also suggested allowing buyers select from properties listed in target areas before making an offer to purchase to limit holding and maintenance costs. This will also ensure there is a buyer for the property when it is completed.

#### 11/24/2008 Deborah Parish

Ms Parish said nobody wants to live in the areas that have been targeted because of high crime and that fixing up some houses will not reduce crime. The targeting discriminates against areas north of the river. She feels landlords will snap up the funds to use in the poor areas and people do not want to live there. She feels the funds should be used in areas that are safe.

#### 11/24/2008 John Santner, Neighbor Works

I also want to congratulate the efforts of the city to put together your NSP plan so quickly. In conversations with my NeighborWorks colleagues nationally, I know many a state and municipality are struggling to figure out how to leverage their NSP resources for maximum impact to battle foreclosures.

I would only suggest that the City look at including a deeper lending portion to the plan as well as the current development and land banking strategy. I think risk is mitigated through lending as opposed to a hold and develop strategy that development or land banking would require. Certainly the city will want to participate in some land banking and development activities -- as to what level --the City will need to decide.

Specifically, I am suggesting that the City look at a Risk Sharing Agreement with an investor (either NHSA through the NHS or other investor locally) that establishes a portion of the NSP allocation as an 10% first-layer stop-loss. A portion of the funds (perhaps one to two million) could be in the loan loss reserve account and then drawn upon as an escrow to cover losses per the Agreement. The city could monitor the escrow balance and report quarterly to the Dept. of Commerce (NSP Grantee) and to the investor partner. Additionally the city could use a small portion of these funds to provide a permanent rate buy down (one million to 500,000) to households to get their PITI below 30% (but not less then 25%) - this will assist assuring that 25% of the funds benefit households earning 50% of the AMI, as well as insuring long term affordability.

As Mark Stalsworth mentions below -- a ten to one ratio is what we think a Loan Loss Reserve (LLR) could trigger for leverage by an investor. I would urge that any loan program is required to have Home Buyer Education (HBE) attached with the loan product. The NHS is qualified and certified by NeighborWorks America to provide such HBE -- it is another layer of protection for neighborhoods and investors that the loans made would be sustainability.

Thank you for the opportunity to respond to the city's NSP -- we wish you the best of luck and please know you have a willing partner to assist you in Neighbor Works America and our chartered member the KCMO NHS. I am copying Leon Gray on this e-mail --he

is the districts lending expert and can answer additional questions you may have about a LLR and interest rate buy down program.

#### 11/24/2008 Mark Stalsworth

I wanted to submit a few comments regarding the discussion in last Friday's meeting that focused on the Neighborhood Stabilization Program.

First, I would repeat my comment that the City has done an excellent job of developing a framework to support programs that will meet the program goals specified by Congress. This is a difficult undertaking with a short delivery window, and I maintain the program addresses the various topics it is intended to address. Given that the program focus is on rehabilitating and re-selling homes, I believe that the final application submitted to HUD should include a reference to supporting financing provided to the purchasers of these homes. Utilizing layering of several programs would provide the greatest benefit.

John Santner touched on possible use of a portion of these funds as a loss layer protector to encourage investors to participate in lending programs. I believe this would be an excellent use for a portion of these funds. The scenario outlined by John will deliver \$10 of assistance for every \$1 invested by NSP. That is impressive leveraging.

The potential buyers of these homes could require expanded underwriting guidelines not currently available at all mortgage lenders. Neighborhood Housing Services, America is the captive financing arm of NeighborWorks, a national not for profit. NHSA has a lending goal that is more mission driven than most lenders, and they continue to offer loan products that are flexible, while being aware of the best needs of the client.

One example of how the NSP could be used to maximum effect is a combining of all these aspects into a single loan. By using a Loss Layer protector, losses to the portfolio would be minimized, encouraging lower interest rates from the lender. By combining existing programs (the KC Dream program and the Section 8 for Homeownership program), we could maximize subsidy, and assist below 50% of AMI households, as required by the NSP. By combining all of the above with the City Maintenance Reserve Account program, the homebuyer would purchase a home that had been recently repaired, they would receive grants to lower the monthly payment, the Housing Authority would make their house payment (for Section 8 clients), the Maintenance Reserve Account would keep the major components of the home in good condition going forward, and if NHSA were used as the lender, they would be able to submit their payment and maintenance account payment in a single payment, ensuring a higher percentage of ongoing participation in the MR program than if the payments must be mailed separately.

I believe that by working together, the City and the non-profit sector can provide services that will make the purchase, rehab and resale of these homes not only possible but efficient and beneficial to the targeted household. I am looking forward to working with the City to design a program that will be a model for the Nation.

Paul Kramer/mg/kcmo 09/26/2008 04:03 PM To Paul Kramer/mg/kcmo@KCMO

CC

bcc David Park/ng/kcmo

Subject

News from City Hall -- City awarded \$7.3 million to combat housing/foreclosure crisis



### **News from City Hall**

City Communications Office City of Kansas City, Mo. www.kcmo.org

CONTACT: Mary Charles, city communications officer, (816) 513-1356

FOR IMMEDIATE RELEASE: Sept. 26, 2008

# City awarded \$7.3 million to combat housing/foreclosure crisis

The U.S. Department of Housing and Urban Development today announced that the recently passed Housing and Economic Recovery Act of 2008 will provide the City of Kansas City, Mo., with \$7,323,734 in funding to help stabilize neighborhoods hit hard by foreclosures and sub-prime mortgages. The state of Missouri will receive \$42,664,187, and the City will have the opportunity to access a portion of that money for the same purpose.

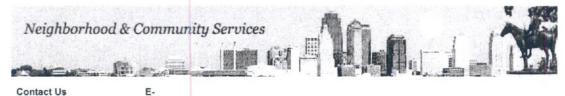
"This influx of federal money will help us target those neighborhoods especially hard hit by the recent housing crisis by fixing or demolishing blighted property and providing assistance to low- to moderate-income homebuyers," City Manager Wayne A. Cauthen said. "It will not solve every problem in our urban core, but will bring relief to people who have suffered the most."

Housing and Urban Development Department guidelines allow state and local governments to acquire land and property; to demolish or rehabilitate abandoned properties; to offer down payment assistance to low-and moderate-income homebuyers; and to create land banks to assemble, manage and dispose of vacant land for the purpose of stabilizing neighborhoods and encouraging private investment and re-use of that property.

"The Housing Committee and City staff have been working diligently to make sure a process was in place to efficiently and effectively use these funds to best serve those in need once they became available," said City Councilwoman Cindy Circo, 5th District at large, and chairwoman of the Housing Committee. "Our congressional delegation did a great job helping to secure these funds and will continue to be an asset in working with the state for additional funding."

The funds are expected to be available in the next 30-90 days, and jurisdictions will then have 18 months to use the funds.

Media inquiries should be directed to Shirley Winn, housing administrator for the City Planning and Development Department, (816) 513-2907.



**Employment Services** 

Residents Visitors Business Neighborhoods Mayor/Council Home

#### Neighborhood Stabilization Program

Neighborhood and Community Services Department

#### Feedback needed on potential use of Neighborhood Stabilization Program money

With \$7.3 million allocated for Kansas City, Mo., as part of the Neighborhood Stabilization Program, resident input is needed for appropriate completion of the action plan that is due to the federal government Dec. 1.

Residents can submit their feedback on this process via e-mail to ncs@kcmo.org. Please type "Neighborhood Stabilization Program" in the subject line. This is the final draft of the City's application (posted Nov. 6 at 2:30 p.m.). Read the SF 424 (application form) and the certifications statement (posted Nov. 14 at 3:30 p.m.).

#### Background

As a result of the U.S. Department of Housing and Urban Development's Economic Recovery Act, the City could receive \$7.3 million to help abate blight resulting from foreclosed and abandoned houses. By abating these conditions, affordable housing will be developed for those most in need and values of neighboring homes will be less likely to be adversely affected.

#### Nature of the program

The municipalities that receive this money will develop their own programs and funding priorities. It is required that they use at least 25 percent of the funds for the purchase and redevelopment of abandoned or foreclosed homes or residential properties that house those whose incomes do not exceed 50 percent of the area median income. All activities funded by the Neighborhood Stabilization Program must benefit low- and moderate-income people whose income does not exceed 120 percent of area median income

#### Eligible uses

Money from the Neighborhood Stabilization Program may be used for activities that include, but are not limited to:

- · Establishing financing mechanisms for purchase and redevelopment of foreclosed homes and residential properties
- · Purchasing and rehabilitating homes and residential properties abandoned or foreclosed
- · Establishing land banks for foreclosed homes
- · Demolishing blighted structures
- Redeveloping demolished or vacant properties.

#### More information

More information about the Neighborhood Stabilization Program can be found by clicking on the following links:

- . Maps relating to foreclosure risk (residential vacancies, foreclosure/abandonment, high cost loan rate, percent of area median income, underlying problem (foreclosure rate))
- · Program regulations
- Title III of the Housing and Economic Recovery Act of 2008
- Program guidelines

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Paul Kramer/mg/kcmo 11/03/2008 11:36 AM

To Paul Kramer/mg/kcmo@KCMO

CC

bcc David Park/ng/kcmo

Subject News from City Hall -- City seeks feedback for Neighborhood Stabilization Program



### **News from City Hall**

City Communications Office City of Kansas City, Mo. www.kcmo.org CONTACT: Mary Charles, city

CONTACT: Mary Charles, city communications officer, (816) 513-1356 FOR IMMEDIATE RELEASE: Nov. 3, 2008

## City seeks feedback for Neighborhood Stabilization

### **Program**

The City of Kansas City, Mo., asks residents to submit feedback about the potential use of \$7.3 million that has been allocated by the federal government as part of the Neighborhood Stabilization Program. The funds are set aside, but a plan must be presented to secure the funds.

Residents can submit their feedback on this process via e-mail to <a href="mailto:ncs@kcmo.org">ncs@kcmo.org</a>. Residents also can give testimony at the Housing Committee meeting Nov. 5 at noon on the 10th floor of City Hall, 414 E. 12th St. The City Council will vote on the proposal Nov. 6.

As a result of the U.S. Department of Housing and Urban Development's Economic Recovery Act, the City was allocated \$7.3 million to help abate blight resulting from foreclosed and abandoned houses. By abating these conditions, affordable housing will be developed for those most in need and values of neighboring homes will be less likely to be adversely affected.

The municipalities that receive this money will develop their own programs and funding priorities. They are required to use at least 25 percent of the funds for the purchase and redevelopment of abandoned or foreclosed homes or residential properties that house those whose incomes do not exceed 50 percent of the area median income. All activities funded by the

Neighborhood Stabilization Program must benefit low- and moderate-income people whose income does not exceed 120 percent of area median income.

To view the most recent draft of the City's application, visit http://www.kcmo.org/neigh/Special%20projects/nsp%20application%20draft %2010-29-08.pdf .

For more information about the Neighborhood Stabilization Program, visit <a href="http://www.kcmo.org/neigh.nsf/web/hudnsp">http://www.kcmo.org/neigh.nsf/web/hudnsp</a> or call Shirley Winn, housing administrator in the City Planning and Development Department, (816) 513-2907.

Amending the 2008 One Year Action Plan and submitting the Substantial Amendment to the U.S. Department of Housing and Urban Development for its consideration in order to receive funding under the Housing and Economic Recovery Act of 2008 (HERA) and authorizing the Director of City Development to submit a proposal(s) to the State of Missouri for funding under HERA.

WHEREAS, in July 2008, Congress enacted Public Law 110-289, the Housing and Economic Recovery Act of 2008 (HERA), which provided funding to U.S. Department of Housing and Urban Development (HUD) to allocate to states, counties and cities in response to the housing crisis; and

WHEREAS, Title III of Division B of HERA created and funded the Emergency Assistance for the Redevelopment of Abandoned and Foreclosed Homes, commonly known as the Neighborhood Stabilization Program, under which state and local governments may utilize the funding by establishing financing mechanisms for the purchase and redevelopment of foreclosed homes and residential properties; purchasing and rehabilitating abandoned or foreclosed residential properties; establishing land banks for foreclosed homes; demolishing blighted structures; and redeveloping demolished or vacant properties, among other eligible activities; and

WHEREAS, the City of Kansas City, Missouri, has been allocated \$7,323,734.00 in funding from HUD to be used toward the above mentioned purposes; and

WHEREAS, in order to receive this funding, the City must amend its 2008 One Year Action Plan which was approved by Council through Committee Substitute For Resolution No. 080218, and submit said Substantial Amendment to HUD for its consideration; and

WHEREAS, the State of Missouri has been allocated \$42,664,187.00 in HERA funding and has implemented a request for proposal process to target areas of greatest need and to determine how its allocations will be further distributed to local governments; and

WHEREAS, the City must submit a proposal(s) to the State in order for the State to consider including the City in its HERA/Neighborhood Stabilization Program funding allocation process; NOW, THEREFORE,

#### BE IT RESOLVED BY THE COUNCIL OF KANSAS CITY:

Section 1. That the Substantial Amendment to the 2008 Action Plan prepared pursuant to the Housing and Economic Recovery Act of 2008, a copy of which, in substantial form, is on file in office of the Director of City Development and is incorporated herein by reference, is hereby approved.

#### RESOLUTION NO. [R-2008-01255]

Section 2. That the Mayor, on behalf of the City of Kansas City, Missouri, is hereby authorized to execute and submit the aforesaid Substantial Amendment to the United States Department of Housing and Urban Development.

Section 3. That the City Council hereby certifies that said Substantial Amendment has been prepared pursuant to and in accordance with the Housing and Economic Recovery Act of 2008 (HERA), as well as with U.S. Department of Housing and Urban Development's standard rules and regulations pertaining to the use of Community Development Block Grant funds.

Section 4. That the Director of City Development, on behalf of the City, is authorized to submit a proposal(s) to the State of Missouri in order for the State to consider including the City in its HERA/Neighborhood Stabilization Program funding allocation process.

Authenticated as Passed

Mark Funkhouser, Mayor

lickie Thompson, City Clerk

NOV 0 6 2008

Date Passed

## NSP GRANT SUBMISSION

### ATTACHMENT B

#### CENSUS TRACTS/BLOCK GROUPS WITH A FORECLOSURE ABANDONMENT RISK SCORE OF 10 AND WITH 51% OF PERSONS AT 120% OF AREA MEDIAN INCOME OR BELOW

#### TARGETED AREAS

TRACT	TRACT	TRACT
000400	005500	012903
000501	005601	012904
000502	005602	013002
000600	005700	013003
000700	005801	013100
000800	005802	013202
001600	005901	013203
001700	005902	013204
001800	006000	060100
001900	006100	008100
002000	006200	008700
002100	006300	008800
002200	006400	008900
002300	007500	009000
002400	007600	009500
002500	007700	009600
003000	007801	010201
003200	007802	010301
003300	007900	010302
003400	0008000	010401
003501	008100	010500
003502	008700	010701
003601	008800	012902
003602	008900	012903
003700	009000	012904
003800	009500	013002
003900	009600	013003
004000	010201	013100
004100	010301	013202
004200	010302	013203
004500	010401	013204
005200	010500	060100
005300	010701	
005400	012902	

### **CERTIFICATIONS**

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

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

- (12) Excessive Force. The jurisdiction certifies that it has adopted and is enforcing: (1) a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and (2) a policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.
- (13) Compliance with anti-discrimination laws. The NSP grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.
- (14) **Compliance with lead-based paint procedures**. The activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.
- (15) Compliance with laws. The jurisdiction will comply with applicable laws.

Signature/Authorized Official

Mark Funkhouser

Mayor

Title

### NSP GRANT SUBMISSION

### ATTACHMENT A

the higher risk	score was	usea.				
COUNTY	TRACT	BLOCK GROUP	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	HMDA HIGH COST LOAN RATE (% OF LOANS THAT ARE SUBPRIME)	PREDICTED 18 MONTH FORECLOSURE RATE	VACANCY RATE PER THE POST OFFICE RECORDS
Jackson County	000100	1	5	23.8%	3.8%	1.9%
Jackson County	000100	1	6	23.8%	4.1%	1.9%
Jackson County	000200	1	3	9.4%	1.7%	5.5%
Jackson County	000200	1	4	9.4%	2.1%	5.5%
Jackson County	000300	1	6	23.7%	3.7%	5.3%
Jackson County	000300	1	7	23.7%	4.1%	5.3%
Jackson County	000300	2	7	23.7%	4.1%	5.3%
Jackson County	000400	1	10	55.6%	8.2%	16.8%
Jackson County	000400	1	10	55.6%	8.6%	16.8%
Jackson County	000400	1	10	55.6%	8.2%	16.8%
Jackson County	000400	1	10	55.6%	8.6%	16.8%
Jackson County	000501	1	10	50.0%	7.4%	19.3%
Jackson County	000501	1	10	50.0%	7.8%	19.3%
Jackson County	000502	1	10	72.3%	10.6%	22.8%
Jackson County	000502	1	10	72.3%	10.9%	22.8%
Jackson County	000600	1	10	59.1%	9.1%	13.3%
Jackson County	000600	2	10	59.1%	9.1%	13.3%
Jackson County	000600	3	10	59.1%	9.1%	13.3%
Jackson County	000600	4	10	59.1%	9.1%	13.3%
Jackson County	000700	1	10	53.1%	8.2%	11.9%
Jackson County	000700	2	10	53.1%	8.2%	11.9%
Jackson County	000700	3	10	53.1%	8.2%	11.9%
Jackson County	000700	4	10	53.1%	7.9%	11.9%
Jackson County	000700	4	10	53.1%	8.2%	11.9%
Jackson County	008000	1	10	48.3%	7.6%	14.1%
Jackson County	00800	2	10	48.3%	7.6%	14.1%
Jackson County	00800	4	10	48.3%	7.6%	14.1%
Jackson County	00800	5	9	48.3%	7.2%	14.1%
Jackson County	00800	5	10	48.3%	7.6%	14.1%
Jackson County	000900	1	9	41.4%	6.6%	11.7%
Jackson County	000900	1	9	41.4%	6.6%	11.7%
Jackson County	000900	2	9	41.4%	6.6%	11.7%
Jackson County	000900	3	9	41.4%	6.6%	11.7%
Jackson County	000900	4	9	41.4%	6.6%	11.7%
Jackson County	001000	1	9	38.5%	6.2%	10.6%
Jackson County	001000	2	9	38.5%	6.2%	10.6%
Jackson County	001000	3	9	38.5%	6.2%	10.6%
Jackson County	001100	1	5	17.9%	3.3%	4.4%
Jackson County	001100	2	5	17.9%	3.3%	4.4%
Jackson County	001200	1	3	6.6%	1.7%	9.7%
Jackson County	001300	1	6	14.6%	2.8%	15.3%
Jackson County	001400	1	3	40.0%	6.4%	0.0%
Jackson County	001500	1	1	0.0%	0.8%	6.8%

the mighter risk	soore was	BLOCK	ESTIMATED FORECLOSURE	HMDA HIGH COST LOAN RATE (% OF LOANS THAT	PREDICTED 18  MONTH	VACANCY RATE PER THE POST
COUNTY	TRACT	GROUP	ABANDONMENT RISK SCORE	ARE SUBPRIME)	FORECLOSURE RATE	OFFICE RECORDS
Jackson County	001600	1	10	50.0%	7.8%	8.9%
Jackson County	001700	1	10	52.5%	8.1%	6.5%
Jackson County	001800	1	10	63.0%	9.6%	22.7%
Jackson County	001800	2	10	63.0%	9.6%	22.7%
Jackson County	001800	6	10	63.0%	9.6%	22.7%
Jackson County	001800	7	10	63.0%	9.6%	22.7%
Jackson County	001900	1	10	62.5%	9.2%	17.7%
Jackson County	001900	1	10	62.5%	9.5%	17.7%
Jackson County	001900	2	10	62.5%	9.5%	17.7%
Jackson County	001900	2	10	62.5%	9.5%	17.7%
Jackson County	001900	3	10	62.5%	9.5%	17.7%
Jackson County	001900	4	10	62.5%	9.5%	17.7%
Jackson County	002000	1	10	60.4%	9.2%	16.8%
Jackson County	002000	2	10	60.4%	9.2%	16.8%
Jackson County	002100	1	10	62.5%	9.5%	16.1%
Jackson County	002100	2	10	62.5%	9.5%	16.1%
Jackson County	002100	3	10	62.5%	9.5%	16.1%
Jackson County	002100	4	10	62.5%	9.5%	16.1%
Jackson County	002200	1	10 /	70.1%	10.6%	20.5%
Jackson County	002200	1	10	70.1%	10.6%	20.5%
Jackson County	002200	2	10	70.1%	10.2%	20.5%
Jackson County	002200	2	10	70.1%	10.6%	20.5%
Jackson County	002200	3	10	70.1%	10.6%	20.5%
Jackson County	002200	3	10	70.1%	10.6%	20.5%
Jackson County	002300	1	10	61.3%	9.4%	16.5%
Jackson County	002300	2	10	61.3%	9.4%	16.5%
Jackson County	002300	2	10	61.3%	9.4%	16.5%
Jackson County	002400	1	10	70.4%	10.6%	16.3%
Jackson County	002500	1	10	52.9%	8.2%	9.5%
Jackson County	002600	1	0	0.0%	0.0%	6.7%
Jackson County	002700	1	0	0.0%	0.0%	10.0%
Jackson County	002801	1	10	100.0%	14.8%	6.9%
Jackson County	002802	1	1	0.0%	0.8%	17.9%
Jackson County	002900	1	5	14.5%	2.8%	11.8%
Jackson County	003000	1	10	50.0%	7.8%	11.7%
Jackson County	003000	2	10	50.0%	7.8%	11.7%
Jackson County	003000	3	10	50.0%	7.8%	11.7%
Jackson County	003100	1	5	7.3%	1.8%	16.4%
Jackson County	003200	1	10	56.7%	8.7%	14.6%
Jackson County	003300	1	10	61.4%	9.4%	21.6%
Jackson County	003300	2	10	61.4%	9.4%	21.6%
Jackson County	003400	1	10	78.1%	11.7%	28.2%
Jackson County	003400	2	10	78.1%	11.7%	28.2%
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the higher risk	score was	useu.		HMDA HIGH		
			ESTIMATED FORECLOSURE	COST LOAN RATE (% OF LOANS THAT	PREDICTED 18 MONTH	VACANCY RATE PER THE POST
COUNTY	TRACT	BLOCK GROUP	ABANDONMENT RISK SCORE	ARE SUBPRIME)	FORECLOSURE RATE	OFFICE RECORDS
Jackson County	003400	3	10	78.1%	11.7%	28.2%
Jackson County	003400	4	10	78.1%	11.7%	28.2%
Jackson County	003501	1	10	78.4%	11.8%	26.3%
Jackson County	003501	2	10	78.4%	11.8%	26.3%
Jackson County	003502	1	10	77.3%	11.6%	23.6%
Jackson County	003601	1	10	80.8%	12.1%	19.7%
Jackson County	003601	1	10	80.8%	12.1%	19.7%
Jackson County	003602	1	10	76.1%	11.5%	24.9%
Jackson County	003602	1	10	76.1%	11.5%	24.9%
Jackson County	003602	2	10	76.1%	11.5%	24.9%
Jackson County	003602	2	10	76.1%	11.5%	24.9%
Jackson County	003700	1	10	75.0%	11.3%	29.4%
Jackson County	003700	2	10	75.0%	11.3%	29.4%
Jackson County	003800	1	10	72.9%	11.0%	19.1%
Jackson County	003800	2	10	72.9%	11.0%	19.1%
Jackson County	003900	1	10	63.3%	9.7%	19.8%
Jackson County	003900	2	10	63.3%	9.7%	19.8%
Jackson County	004000	1	10	79.6%	11.9%	32.4%
Jackson County	004000	2	10	79.6%	11.9%	32.4%
Jackson County	004100	1	10	50.0%	7.8%	16.7%
Jackson County	004200	1	10	81.4%	12.2%	22.3%
Jackson County	004200	2	10	81.4%	12.2%	22.3%
Jackson County	004300	1	7	20.1%	3.6%	12.7%
Jackson County	004300	2	7	20.1%	3.6%	12.7%
Jackson County	004300	3	7	20.1%	3.6%	12.7%
Jackson County	004400	1	5	8.0%	1.9%	21.2%
Jackson County	004500	1	10	63.2%	9.6%	10.7%
Jackson County	004600	1	5	16.1%	3.0%	4.8%
Jackson County	004600	2	5	16.1%	3.0%	4.8%
Jackson County	004600	3	5	16.1%	3.0%	4.8%
Jackson County	004600	4	5	16.1%	3.0%	4.8%
Jackson County	004700	1	8	28.6%	4.8%	14.1%
Jackson County	004800	1	7	22.2%	3.9%	21.2%
Jackson County	004800	2	7	22.2%	3.9%	21.2%
Jackson County	004900	1	8	28.3%	4.7%	18.2%
Jackson County	004900	2	8	28.3%	4.7%	18.2%
Jackson County	005000	1	8	31.1%	5.1%	21.6%
Jackson County	005000	2	8	31.1%	5.1%	21.6%
Jackson County	005000	3	8	31.1%	5.1%	21.6%
Jackson County	005100	1	5	14.1%	2.8%	11.7%
Jackson County	005100	2	5	14.1%	2.8%	11.7%
Jackson County	005200	1	10	51.5%	8.0%	11.9%
Jackson County	005200	2	10	51.5%	8.0%	11.9%
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Some census tract block group combinations are listed more than once. When there were differences,

the higher risk score was used.

the higher risk	. score was	BLOCK	ESTIMATED FORECLOSURE ABANDONMENT	HMDA HIGH COST LOAN RATE (% OF LOANS THAT ARE	PREDICTED 18 MONTH FORECLOSURE	VACANCY RATE PER THE POST OFFICE
COUNTY	TRACT	GROUP	RISK SCORE	SUBPRIME)	RATE	RECORDS
Jackson County	005300	1	10	53.7%	8.3%	15.8%
Jackson County	005300	2	10	53.7%	8.3%	15.8%
Jackson County	005400	1	10	76.5%	11.5%	24.5%
Jackson County	005400	2	10	76.5%	11.5%	24.5%
Jackson County	005500	1	10	86.7%	12.9%	25.4%
Jackson County	005500	2	10	86.7%	12.9%	25.4%
Jackson County	005601	1	10	79.6%	11.9%	20.4%
Jackson County	005601	2	10	79.6%	11.9%	20.4%
Jackson County	005602	1	10	75.0%	11.3%	25.7%
Jackson County	005602	2	10	75.0%	11.3%	25.7%
Jackson County	005700	1	10	81.2%	12.2%	18.4%
Jackson County	005700	1	10	81.2%	12.2%	18.4%
Jackson County	005700	2	10	81.2%	12.2%	18.4%
Jackson County	005700	3	10	81.2%	12.2%	18.4%
Jackson County	005700	4	10	81.2%	12.2%	18.4%
Jackson County	005700	4	10	81.2%	12.2%	18.4%
Jackson County	005801	1	10	77.5%	11.3%	15.7%
Jackson County	005801	1	10	77.5%	11.6%	15.7%
Jackson County	005801	2	10	77.5%	11.6%	15.7%
Jackson County	005801	2	10	77.5%	11.6%	15.7%
Jackson County	005801	3	10	77.5%	11.6%	15.7%
Jackson County	005801	3	10	77.5%	11.6%	15.7%
Jackson County	005801	4	10	77.5%	11.6%	15.7%
Jackson County	005801	5	10	77.5%	11.6%	15.7%
Jackson County	005802	1	10	77.8%	11.7%	14.8%
Jackson County	005802	1	10	77.8%	11.7%	14.8%
Jackson County	005802	2	10	77.8%	11.7%	14.8%
Jackson County	005802	3	10	77.8%	11.7%	14.8%
Jackson County	005802	4	10	77.8%	11.7%	14.8%
Jackson County	005901	1	10	100.0%	14.8%	15.5%
Jackson County	005902	1	10	51.9%	7.7%	13.3%
Jackson County	005902	1	10	51.9%	8.1%	13.3%
Jackson County	005902	2	10	51.9%	8.1%	13.3%
Jackson County	005902	2	10	51.9%	8.1%	13.3%
Jackson County	005902	3	10	51.9%	8.1%	13.3%
Jackson County	005902	3	10	51.9%	8.1%	13.3%
Jackson County	006000	1	10	75.7%	11.4%	19.9%
Jackson County	006000	2	10	75.7%	11.4%	19.9%
Jackson County	006100	1	10	76.7%	11.5%	21.0%
Jackson County	006100	2	10	76.7%	11.5%	21.0%
Jackson County	006100	3	10	76.7%	11.5%	21.0%
Jackson County	006200	1	10	83.6%	12.5%	25.5%
Jackson County	006200	2	10	83.6%	12.5%	25.5%
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the higher risk	. Score was	used.	ESTIMATED	HMDA HIGH COST LOAN RATE (% OF	PREDICTED 18	VACANCY RATE PER
			FORECLOSURE	LOANS THAT	MONTH	THE POST
COUNTY	TRACT	BLOCK GROUP	ABANDONMENT RISK SCORE	ARE SUBPRIME)	FORECLOSURE RATE	OFFICE RECORDS
Jackson County	006300	1	10	81.9%	12.3%	29.1%
Jackson County	006300	2	10	81.9%	12.3%	29.1%
Jackson County	006300	3	10	81.9%	12.3%	29.1%
Jackson County	006400	1	10	69.9%	10.6%	19.3%
Jackson County	006400	2	10	69.9%	10.6%	19.3%
Jackson County	006500	1	8	32.3%	5.3%	11.3%
Jackson County	006500	2	8	32.3%	5.3%	11.3%
Jackson County	006600	1	7	22.1%	3.9%	12.8%
Jackson County	006600	2	7	22.1%	3.9%	12.8%
Jackson County	006600	3	7	22.1%	3.9%	12.8%
Jackson County	006700	1	6	14.0%	2.8%	16.0%
Jackson County	006700	2	6	14.0%	2.8%	16.0%
Jackson County	006700	3	6	14.0%	2.8%	16.0%
Jackson County	006800	1	8	31.3%	5.2%	8.4%
Jackson County	006900	1	6	14.4%	2.8%	13.2%
Jackson County	006900	2	6	14.4%	2.8%	13.2%
Jackson County	007000	1	7	27.5%	4.6%	8.7%
Jackson County	007000	2	7	27.5%	4.6%	8.7%
Jackson County	007000	3	7	27.5%	4.6%	8.7%
Jackson County	007100	1	7	19.3%	3.5%	12.4%
Jackson County	007100	2	7	19.3%	3.5%	12.4%
Jackson County	007100	4	7	19.3%	3.5%	12.4%
Jackson County	007200	1	4	11.7%	2.4%	5.1%
Jackson County	007200	2	4	11.7%	2.4%	5.1%
Jackson County	007200	3	4	11.7%	2.4%	5.1%
Jackson County	007300	1	4	8.2%	1.9%	11.3%
Jackson County	007300	2	4	8.2%	1.9%	11.3%
Jackson County	007300	3	4	8.2%	1.9%	11.3%
Jackson County	007300	4	4	8.2%	1.9%	11.3%
Jackson County	007400	1	4	10.8%	2.3%	6.3%
Jackson County	007400	2	4	10.8%	2.3%	6.3%
Jackson County	007400	3	4	10.8%	2.3%	6.3%
Jackson County	007400	4	4	10.8%	2.3%	6.3%
Jackson County	007500	1	10	54.6%	8.4%	16.8%
Jackson County	007500	1	10	54.6%	8.4%	16.8%
Jackson County	007500	2	10	54.6%	8.4%	16.8%
Jackson County	007500	3	10	54.6%	8.4%	16.8%
Jackson County	007600	1	10	72.6%	11.0%	20.3%
Jackson County	007600	2	10	72.6%	11.0%	20.3%
Jackson County	007600	2	10	72.6%	11.0%	20.3%
Jackson County	007600	3	10	72.6%	11.0%	20.3%
Jackson County	007600	3	10	72.6%	11.0%	20.3%
Jackson County	007700	1	10	75.0%	11.3%	12.5%

the higher risk	score was	s used.		HMDA HIGH		
			ESTIMATED FORECLOSURE	COST LOAN RATE (% OF LOANS THAT	PREDICTED 18 MONTH	VACANCY RATE PER THE POST
		BLOCK	ABANDONMENT	ARE	FORECLOSURE	OFFICE
COUNTY	TRACT	GROUP	RISK SCORE	SUBPRIME)	RATE	RECORDS
Jackson County	007700	2	10	75.0%	11.3%	12.5%
Jackson County	007801	1	10	75.4%	11.4%	8.7%
Jackson County	007802	1	10	70.2%	10.6%	14.6%
Jackson County	007802	1	10	70.2%	10.6%	14.6%
Jackson County	007802	2	10	70.2%	10.6%	14.6%
Jackson County	007802	2	10	70.2%	10.6%	14.6%
Jackson County	007802	3	10	70.2%	10.6%	14.6%
Jackson County	007900	1	10	71.4%	10.8%	18.2%
Jackson County	007900	2	10	71.4%	10.8%	18.2%
Jackson County	007900	3	10	71.4%	10.8%	18.2%
Jackson County	007900	4	10	71.4%	10.8%	18.2%
Jackson County	007900	5	10	71.4%	10.8%	18.2%
Jackson County	008000	1	10	60.5%	9.3%	11.8%
Jackson County	008000	2	10	60.5%	9.3%	11.8%
Jackson County	008000	3	. 10	60.5%	9.3%	11.8%
Jackson County	008000	4	10	60.5%	9.3%	11.8%
Jackson County	008100	1	10	67.1%	10.2%	13.8%
Jackson County	008100	2	10	67.1%	10.2%	13.8%
Jackson County	008100	3	10	67.1%	10.2%	13.8%
Jackson County	008200	1	5	16.8%	3.1%	2.7%
Jackson County	008200	2	5	16.8%	3.1%	2.7%
Jackson County	008200	3	5	16.8%	3.1%	2.7%
Jackson County	008200	4	5	16.8%	3.1%	2.7%
Jackson County	008300	1	4	9.3%	2.1%	2.9%
Jackson County	008300	2	4	9.3%	2.1%	2.9%
Jackson County	008400	1	3	7.0%	1.8%	2.7%
Jackson County	008400	2	3	7.0%	1.8%	2.7%
Jackson County	008400	3	3	7.0%	1.8%	2.7%
Jackson County	008500	1	4	9.9%	2.2%	3.0%
Jackson County	008500	2	4	9.9%	2.2%	3.0%
Jackson County	008500	3	4	9.9%	2.2%	3.0%
Jackson County	008600	1	4	10.3%	2.2%	3.9%
Jackson County	008600	2	4	10.3%	2.2%	3.9%
Jackson County	008600	3	4	10.3%	2.2%	3.9%
Jackson County	008600	4	4	10.3%	2.2%	3.9%
Jackson County	008600	5	4	10.3%	2.2%	3.9%
Jackson County	008700	1	10	71.0%	10.7%	15.6%
Jackson County	008700	2	10	71.0%	10.7%	15.6%
Jackson County	008700	3	10	71.0%	10.7%	15.6%
Jackson County	008800	1	10	76.6%	11.5%	18.8%
Jackson County	008800	2	10	76.6%	11.5%	18.8%
Jackson County	008800	3	10	76.6%	11.5%	18.8%
Jackson County	008800	4	10	76.6%	11.5%	18.8%
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Some census tract block group combinations are listed more than once. When there were differences,

the higher risk score was used.

mg			ESTIMATED FORECLOSURE	HMDA HIGH COST LOAN RATE (% OF LOANS THAT	PREDICTED 18 MONTH	VACANCY RATE PER THE POST
COUNTY	TRACT	BLOCK GROUP	ABANDONMENT RISK SCORE	ARE SUBPRIME)	FORECLOSURE RATE	OFFICE RECORDS
Jackson County	008800	5	10	76.6%	11.5%	18.8%
Jackson County	008800	6	10	76.6%	11.5%	18.8%
Jackson County	008900	1	10	73.8%	11.1%	14.5%
Jackson County	008900	2	10	73.8%	11.1%	14.5%
Jackson County	008900	3	10	73.8%	11.1%	14.5%
Jackson County	008900	4	10	73.8%	11.1%	14.5%
Jackson County	009000	1	10	66.4%	10.1%	12.0%
Jackson County	009000	2	10	66.4%	10.1%	12.0%
Jackson County	009000	3	10	66.4%	10.1%	12.0%
Jackson County	009000	4	10	66.4%	10.1%	12.0%
Jackson County	009000	5	10	66.4%	10.1%	12.0%
Jackson County	009100	1	5	18.1%	3.3%	4.6%
Jackson County	009100	2	5	18.1%	3.3%	4.6%
Jackson County	009100	3	5	18.1%	3.3%	4.6%
Jackson County	009100	4	5	18.1%	3.3%	4.6%
Jackson County	009200	1	4	12.0%	2.5%	4.7%
Jackson County	009200	2	4	12.0%	2.5%	4.7%
Jackson County	009200	4	4	12.0%	2.5%	4.7%
Jackson County	009300	1	5	19.9%	3.6%	2.5%
Jackson County	009300	2	5	19.9%	3.6%	2.5%
Jackson County	009300	3	5	19.9%	3.6%	2.5%
Jackson County	009400	1	8	30.7%	5.1%	8.5%
Jackson County	009400	2	8	30.7%	5.1%	8.5%
Jackson County	009400	3	8	30.7%	5.1%	8.5%
Jackson County	009400	4	8	30.7%	5.1%	8.5%
Jackson County	009400	5	8	30.7%	5.1%	8.5%
Jackson County	009500	1	10	65.8%	10.0%	22.2%
Jackson County	009500	2	10	65.8%	10.0%	22.2%
Jackson County	009500	2	10	65.8%	10.0%	22.2%
Jackson County	009500	3	10	65.8%	10.0%	22.2%
Jackson County	009500	4	10	65.8%	10.0%	22.2%
Jackson County	009600	1	10	67.2%	10.2%	15.2%
Jackson County	009600	1	10	67.2%	10.2%	15.2%
Jackson County	009600	2	10	67.2%	10.2%	15.2%
Jackson County	009700	1	9	45.5%	7.2%	25.9%
Jackson County	009700	2	9	45.5%	6.8%	25.9%
Jackson County	009700	2	9	45.5%	7.2%	25.9%
Jackson County	009800	1	8	28.3%	4.8%	6.6%
Jackson County	009800	2	8	28.3%	4.8%	6.6%
Jackson County	009800	3	8	28.3%	4.8%	6.6%
Jackson County	009800	4	8	28.3%	4.8%	6.6%
Jackson County	009900	1	5	21.2%	3.8%	2.4%
Jackson County	009900	2	5	21.2%	3.8%	2.4%
,,						

the higher risk	score was	s used.				
COUNTY	TRACT	BLOCK GROUP	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	HMDA HIGH COST LOAN RATE (% OF LOANS THAT ARE SUBPRIME)	PREDICTED 18 MONTH FORECLOSURE RATE	VACANCY RATE PER THE POST OFFICE RECORDS
Indiana Orași	040004	0	7	04.50/	0.00/	10.50/
Jackson County	010001	2	7 7	21.5%	3.8%	10.5%
Jackson County	010001	3		21.5%	3.8%	10.5%
Jackson County	010002	1 2	6 6	19.4%	3.5%	4.7%
Jackson County	010002 010103	1	9	19.4% 34.9%	3.5% 5.7%	4.7% 10.7%
Jackson County		2	9			
Jackson County	010103	3		34.9%	5.7%	10.7%
Jackson County	010103		9	34.9%	5.7%	10.7%
Jackson County	010104	1	4	15.0%	2.9%	2.5%
Jackson County	010105	1	5	14.7%	2.8%	3.2%
Jackson County	010105	2	5	14.7%	2.8%	3.2%
Jackson County	010105	3	5	14.7%	2.8%	3.2%
Jackson County	010106	1	5	18.0%	3.3%	2.8%
Jackson County	010106	2	5	18.0%	3.3%	2.8%
Jackson County	010106	3	5	18.0%	3.3%	2.8%
Jackson County	010201	1	9	46.8%	7.0%	16.9%
Jackson County	010201	1	10	46.8%	7.3%	16.9%
Jackson County	010201	2	10	46.8%	7.3%	16.9%
Jackson County	010203	1	8	37.7%	6.1%	2.2%
Jackson County	010203	2	8	37.7%	6.1%	2.2%
Jackson County	010203	3	8	37.7%	6.1%	2.2%
Jackson County	010203	4	8	37.7%	6.1%	2.2%
Jackson County	010204	1	8	32.8%	5.4%	2.5%
Jackson County	010204	1	8	32.8%	5.4%	2.5%
Jackson County	010204	2	8	32.8%	5.4%	2.5%
Jackson County	010204	3	8	32.8%	5.4%	2.5%
Jackson County	010301	1	10	54.2%	8.4%	10.1%
Jackson County	010302	1	10	51.7%	8.0%	7.0%
Jackson County	010302	2	10	51.7%	8.0%	7.0%
Jackson County	010302	3	10	51.7%	8.0%	7.0%
Jackson County	010401	1	10	54.6%	8.4%	4.3%
Jackson County	010401	1	10	54.6%	8.4%	4.3%
Jackson County	010401	1	10	54.6%	8.4%	4.3%
Jackson County	010401	2	10	54.6%	8.4%	4.3%
Jackson County	010402	1	3	47.9%	7.5%	0.0%
Jackson County	010500	1	10	57.7%	8.9%	7.0%
Jackson County	010500	2	10	57.7%	8.9%	7.0%
Jackson County	010500	3	10	57.7%	8.9%	7.0%
Jackson County	010500	4	10	57.7%	8.9%	7.0%
Jackson County	010500	5	10	57.7%	8.9%	7.0%
Jackson County	010500	6	10	57.7%	8.9%	7.0%
Jackson County	010500	7	10	57.7%	8.9%	7.0%
Jackson County	010600	1	9	44.8%	7.1%	5.0%
Jackson County	010600	2	9	44.8%	7.1%	5.0%

the higher risk	score was	s used.				
COUNTY	TRACT	BLOCK GROUP	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	HMDA HIGH COST LOAN RATE (% OF LOANS THAT ARE SUBPRIME)	PREDICTED 18 MONTH FORECLOSURE RATE	VACANCY RATE PER THE POST OFFICE RECORDS
Jackson County	010600	3	9	44.8%	7.1%	5.0%
Jackson County	010600	4	9	44.8%	7.1%	5.0%
Jackson County	010701	1	10	49.0%	7.6%	9.5%
Jackson County	010702	1	8	33.3%	5.5%	6.5%
Jackson County	010702	2	8	33.3%	5.5%	6.5%
Jackson County	010801	1	9	54.1%	8.4%	3.0%
Jackson County	010802	9	0	0.0%	0.0%	0.0%
Jackson County	010902	1	8	72.7%	11.0%	0.4%
Jackson County	012400	2	8	35.6%	5.4%	4.7%
Jackson County	012501	1	8	40.9%	6.1%	5.8%
Jackson County	012501	4	8	40.9%	6.1%	5.8%
Jackson County	012503	1	8	37.4%	6.0%	3.9%
Jackson County	012503	2	8	37.4%	6.0%	3.9%
Jackson County	012503	3	8	37.4%	6.0%	3.9%
Jackson County	012702	9	5	18.6%	3.4%	3.2%
Jackson County	012702	9	5	18.6%	3.4%	3.2%
Jackson County	012802	2	8	36.8%	5.9%	4.5%
Jackson County	012902	1	10	51.4%	8.0%	6.1%
Jackson County	012902	2	10	51.4%	8.0%	6.1%
Jackson County	012902	3	10	51.4%	8.0%	6.1%
Jackson County	012902	4	10	51.4%	8.0%	6.1%
Jackson County	012903	1	10	62.5%	9.5%	5.9%
Jackson County	012903	2	10	62.5%	9.5%	5.9%
Jackson County	012903	3	10	62.5%	9.5%	5.9%
Jackson County	012903	4	10	62.5%	9.5%	5.9%
Jackson County	012904	1	10	51.7%	8.0%	4.3%
Jackson County	012904	2	10	51.7%	8.0%	4.3%
Jackson County	012904	3 .	10	51.7%	8.0%	4.3%
Jackson County	013001	1	1	0.0%	0.8%	33.3%
Jackson County	013002	1	10	58.2%	8.9%	8.7%
Jackson County	013003	1	10	60.6%	9.3%	6.0%
Jackson County	013003	2	10	60.6%	9.3%	6.0%
Jackson County	013003	3	10	60.6%	9.3%	6.0%
Jackson County	013003	4	10	60.6%	9.3%	6.0%
Jackson County	013100	1	10	55.6%	8.6%	8.0%
Jackson County	013100	2	10 10	55.6%	8.6% 8.6%	8.0% 8.0%
Jackson County	013100	1	10	55.6% 57.9%	8.9%	6.0%
Jackson County Jackson County	013202 013202		10	57.9%	8.9%	6.0%
Jackson County  Jackson County	013202	2	10	65.3%	9.9%	13.8%
Jackson County  Jackson County	013203	2	10	65.3%	9.9%	13.8%
Jackson County  Jackson County	013203	3	10	65.3%	9.9%	13.8%
Jackson County	013203	4	10	65.3%	9.9%	13.8%
odonoon ooding	010200	-1	10	00.070	0.070	10.070

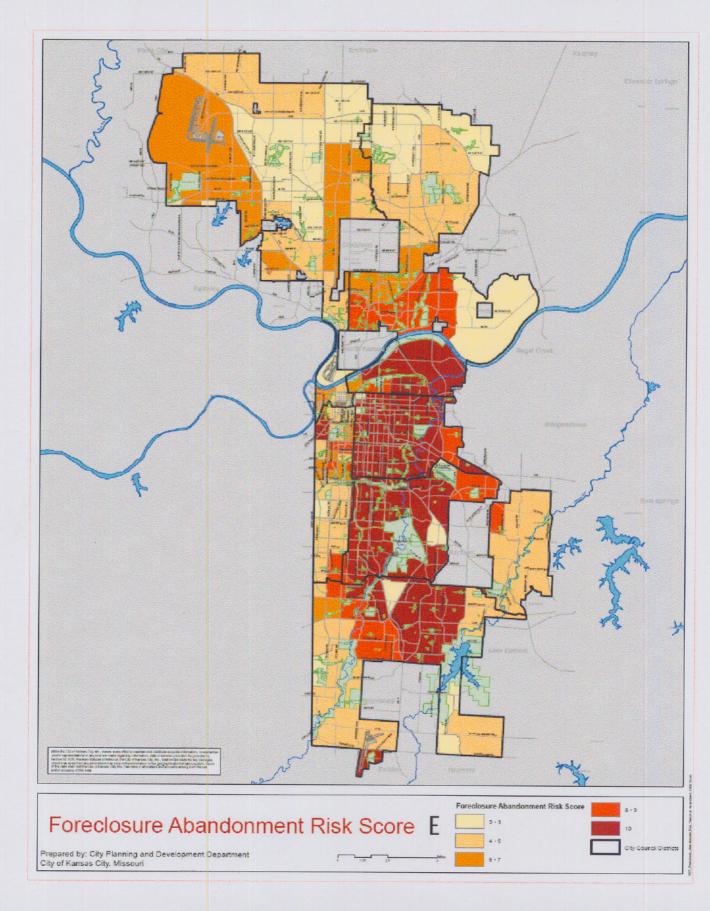
the figher risk	score was	s used.				
		BLOCK	ESTIMATED FORECLOSURE ABANDONMENT	HMDA HIGH COST LOAN RATE (% OF LOANS THAT ARE	PREDICTED 18 MONTH FORECLOSURE	VACANCY RATE PER THE POST OFFICE
COUNTY	TRACT	GROUP	RISK SCORE	SUBPRIME)	RATE	RECORDS
Jackson County	013204	1	10	63.4%	9.7%	7.5%
Jackson County	013204	2	10	63.4%	9.7%	7.5%
Jackson County	013204	3	10	63.4%	9.3%	7.5%
Jackson County	013204	3	10	63.4%	9.7%	7.5%
Jackson County	013404	9	1	0.0%	0.8%	0.0%
Jackson County	013405	1	4	11.5%	2.4%	2.6%
Jackson County	013405	1	4	11.5%	2.4%	2.6%
Jackson County	013405	9	4	11.5%	2.4%	2.6%
Jackson County	013405	9	4	11.5%	2.4%	2.6%
Jackson County	013407	1	3	11.3%	2.4%	1.3%
Jackson County	013407	2	3	11.3%	2.4%	1.3%
Jackson County	013408	1	5	18.3%	3.4%	1.9%
Jackson County	013408	2	4	18.3%	3.0%	1.9%
Jackson County	013408	2	5	18.3%	3.4%	1.9%
Jackson County	013408	2	5	18.3%	3.4%	1.9%
Jackson County	013408	3	5	18.3%	3.4%	1.9%
Jackson County	013501	1	3	19.9%	3.2%	0.2%
Jackson County	013501	1	4	19.9%	3.6%	0.2%
Jackson County	013601	3	6	17.5%	3.2%	12.4%
Jackson County	013602	2	3	13.0%	2.2%	0.4%
Jackson County	013602	2	3	13.0%	2.6%	0.4%
Jackson County	014203	1	1	16.1%	2.7%	0.0%
Jackson County	014203	2	1	16.1%	3.0%	0.0%
Jackson County	014204	2	1	17.1%	3.2%	0.0%
Jackson County	014204	3	1	17.1%	3.2%	0.0%
Jackson County	014300	1	5	24.7%	4.2%	0.8%
Jackson County	014300	2	5	24.7%	3.9%	0.8%
Jackson County	014300	2	5	24.7%	3.9%	0.8%
Jackson County	014300	2	5	24.7%	4.2%	0.8%
Jackson County	014300	2	5	24.7%	4.2%	0.8%
Jackson County	014400	1	5	24.2%	4.2%	0.4%
Jackson County	014400	1	5	24.2%	3.8%	0.4%
Jackson County	014400	1	5	24.2%	4.2%	0.4%
Jackson County	014400	1	5	24.2%	4.2%	0.4%
Jackson County	014400	1	5	24.2%	4.2%	0.4%
Jackson County	014400	1	5	24.2%	4.2%	0.4%
Jackson County	014501	1	5	22.4%	3.6%	2.7%
Jackson County	014501	2	5	22.4%	3.9%	2.7%
Jackson County	014502	1	5	19.8%	3.6%	1.8%
Clay County	020000	1	3	36.8%	5.3%	0.0%
Clay County	020000	1	3	36.8%	5.9%	0.0%
Clay County	020201	1	9	39.8%	6.4%	4.4%
Clay County	020201	2	9	39.8%	6.4%	4.4%

the higher risk	score was	s used.				
COUNTY	TRACT	BLOCK GROUP	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	HMDA HIGH COST LOAN RATE (% OF LOANS THAT ARE SUBPRIME)	PREDICTED 18 MONTH FORECLOSURE RATE	VACANCY RATE PER THE POST OFFICE RECORDS
0001111	110.001	GITTO CT	111011 000112	0022,		
Clay County	020201	3	9	39.8%	6.4%	4.4%
Clay County	020201	4	9	39.8%	6.4%	4.4%
Clay County	020202	1	5	15.3%	2.9%	4.4%
Clay County	020202	2	5	15.3%	2.9%	4.4%
Clay County	020300	1	6	27.1%	4.6%	2.6%
Clay County	020300	2	6	27.1%	4.6%	2.6%
Clay County	020300	3	6	27.1%	4.6%	2.6%
Clay County	020300	4	6	27.1%	4.6%	2.6%
Clay County	020300	5	6	27.1%	4.6%	2.6%
Clay County	020400	1	7	31.3%	5.2%	3.2%
Clay County	020400	1	7	31.3%	5.2%	3.2%
Clay County	020400	2	7	31.3%	5.2%	3.2%
Clay County	020500	1	9	42.3%	6.7%	4.2%
Clay County	020500	2	9	42.3%	6.7%	4.2%
Clay County	020500	3	9	42.3%	6.7%	4.2%
Clay County	020500	4	9	42.3%	6.7%	4.2%
Clay County	020500	5	9	42.3%	6.7%	4.2%
Clay County	020500	6	9	42.3%	6.7%	4.2%
Clay County	020602	1	9	40.6%	6.5%	2.8%
Clay County	020602	2	8	40.6%	5.8%	2.8%
Clay County	020602	2	8	40.6%	5.8%	2.8%
Clay County	020602	2	8	40.6%	5.8%	2.8%
Clay County	020602	2	9	40.6%	6.5%	2.8%
Clay County	020602	3	9	40.6%	6.5%	2.8%
Clay County	020602	4	8	40.6%	5.8%	2.8%
Clay County	020602	4	9	40.6%	6.5%	2.8%
Clay County	020602	5	9	40.6%	6.5%	2.8%
Clay County	020603	1	9	43.2%	6.8%	5.8%
Clay County	020603	2	9	43.2%	6.8%	5.8%
Clay County	020603	3	9	43.2%	6.8%	5.8%
Clay County	020604	1	9	43.1%	6.8%	4.0%
Clay County	020604	2	9	43.1%	6.8%	4.0%
Clay County	020604	3	9	43.1%	6.8%	4.0%
Clay County	020604	4	9	43.1%	6.8%	4.0%
Clay County	020604	4	9	43.1%	6.8%	4.0%
Clay County	020604	5	9	43.1%	6.8%	4.0%
Clay County	020700	1	9	44.2%	7.0%	4.1%
Clay County	020700	2	9	44.2%	7.0%	4.1%
Clay County	020700	3	9	44.2%	7.0%	4.1%
Clay County	020700	3	9	44.2%	7.0%	4.1%
Clay County	020700	4	9	44.2%	7.0%	4.1%
Clay County	020801	3	5	26.4%	3.8%	1.9%
Clay County	020901	1	5	24.9%	3.6%	2.2%

BLOCK   STIMATED   FORECLOSURE   BLOCK   ABANDOMMENT   GROUP   RISK SCORE   SUPPLIED	the ingher in	sk score was	useu.		LIMBALIIOLI		
Clay County 020901 2 5 24.9% 3.6% 2.2% Clay County 020901 2 6 24.9% 4.3% 2.2% Clay County 020901 3 6 24.9% 4.3% 2.2% Clay County 020901 4 6 24.9% 4.3% 2.2% Clay County 020901 4 6 24.9% 4.3% 2.2% Clay County 020901 5 6 24.9% 4.3% 2.2% Clay County 020901 5 6 24.9% 4.3% 2.2% Clay County 020902 1 7 32.7% 5.4% 4.2% Clay County 020902 1 7 32.7% 5.4% 4.2% Clay County 020902 2 7 32.7% 5.4% 4.2% Clay County 020902 2 7 32.7% 5.4% 4.2% Clay County 021203 1 7 30.4% 5.0% 1.3% Clay County 021203 2 7 30.4% 5.0% 1.3% Clay County 021203 2 7 30.4% 5.0% 1.3% Clay County 021203 3 7 30.4% 5.0% 1.3% Clay County 021203 4 7 30.4% 5.0% 1.3% Clay County 021203 4 7 30.4% 5.0% 1.3% Clay County 021203 4 7 30.4% 5.0% 1.3% Clay County 021204 1 7 30.7% 5.1% 1.9% Clay County 021204 1 7 30.7% 5.1% 1.9% Clay County 021204 2 7 30.7% 5.1% 1.9% Clay County 021204 5 5 20.1% 3.6% 1.0% Clay County 021205 1 5 20.1% 3.6% 1.0% Clay County 021205 1 5 20.1% 3.6% 1.0% Clay County 021205 1 5 20.1% 3.6% 1.0% Clay County 021206 2 5 18.2% 3.3% 1.3% Clay County 021206 2 5 18.2% 3.3% 1.3% Clay County 021206 1 5 18.2% 3.3% 1.3% Clay County 021206 2 5 18.2% 3.3% 1.3% Clay County 021206 3 5 18.2% 3.3% 1.3% Clay County 021206 3 5 18.2% 3.3% 1.3% Clay County 021206 3 5 18.2% 3.3% 1.3% Clay County 021206 1 5 18.2% 3.3% 1.3% Clay County 021206 2 5 18.2% 3.3% 1.3% Clay County 021206 3 5 18.2% 3.3% 1.3% Clay County 021303 1 1 9.7% 2.2% 0.0% Clay County 021304 1 4 15.2% 2.9% 0.7% Clay County 021304 2 4 15.2% 2.9% 0.7% Clay County 021304 2 4 15.2% 2.9% 0.7% Clay County 021305	COUNTY	TRACT		FORECLOSURE ABANDONMENT	RATE (% OF LOANS THAT ARE	MONTH FORECLOSURE	RATE PER THE POST OFFICE
Clay County 020901 2 5 24.9% 3.6% 2.2% Clay County 020901 2 6 24.9% 4.3% 2.2% Clay County 020901 3 6 24.9% 4.3% 2.2% Clay County 020901 4 6 24.9% 4.3% 2.2% Clay County 020901 4 6 24.9% 4.3% 2.2% Clay County 020901 5 6 24.9% 4.3% 2.2% Clay County 020901 5 6 24.9% 4.3% 2.2% Clay County 020902 1 7 32.7% 5.4% 4.2% Clay County 020902 1 7 32.7% 5.4% 4.2% Clay County 020902 2 7 32.7% 5.4% 4.2% Clay County 020902 2 7 32.7% 5.4% 4.2% Clay County 021203 1 7 30.4% 5.0% 1.3% Clay County 021203 2 7 30.4% 5.0% 1.3% Clay County 021203 2 7 30.4% 5.0% 1.3% Clay County 021203 3 7 30.4% 5.0% 1.3% Clay County 021203 4 7 30.4% 5.0% 1.3% Clay County 021203 4 7 30.4% 5.0% 1.3% Clay County 021203 4 7 30.4% 5.0% 1.3% Clay County 021204 1 7 30.7% 5.1% 1.9% Clay County 021204 1 7 30.7% 5.1% 1.9% Clay County 021204 2 7 30.7% 5.1% 1.9% Clay County 021204 5 5 20.1% 3.6% 1.0% Clay County 021205 1 5 20.1% 3.6% 1.0% Clay County 021205 1 5 20.1% 3.6% 1.0% Clay County 021205 1 5 20.1% 3.6% 1.0% Clay County 021206 2 5 18.2% 3.3% 1.3% Clay County 021206 2 5 18.2% 3.3% 1.3% Clay County 021206 1 5 18.2% 3.3% 1.3% Clay County 021206 2 5 18.2% 3.3% 1.3% Clay County 021206 3 5 18.2% 3.3% 1.3% Clay County 021206 3 5 18.2% 3.3% 1.3% Clay County 021206 3 5 18.2% 3.3% 1.3% Clay County 021206 1 5 18.2% 3.3% 1.3% Clay County 021206 2 5 18.2% 3.3% 1.3% Clay County 021206 3 5 18.2% 3.3% 1.3% Clay County 021303 1 1 9.7% 2.2% 0.0% Clay County 021304 1 4 15.2% 2.9% 0.7% Clay County 021304 2 4 15.2% 2.9% 0.7% Clay County 021304 2 4 15.2% 2.9% 0.7% Clay County 021305					04.00/	4.00/	0.00/
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Clay County 021306 1 6 24.7% 4.2% 1.3%	Clay County	021305	3		23.8%	4.1%	0.0%
		021306	1	6	24.7%	4.2%	1.3%
Clay County 021306 2 6 24.7% 4.2% 1.3%	Clay County	021306	1	6	24.7%	4.2%	1.3%
	Clay County	021306	2	6	24.7%	4.2%	1.3%

COUNTY	TRACT	BLOCK GROUP	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	HMDA HIGH COST LOAN RATE (% OF LOANS THAT ARE SUBPRIME)	PREDICTED 18 MONTH FORECLOSURE RATE	VACANCY RATE PER THE POST OFFICE RECORDS
Clay County	021306	3	6	24.7%	4.2%	1.3%
Clay County	021500	1	3	44.0%	6.3%	0.0%
Clay County	021500	1	3	44.0%	7.0%	0.0%
Clay County	021801	1	2	18.8%	3.4%	0.0%
Clay County	021801	1	2	18.8%	3.4%	0.0%
Clay County	021900	2	2	23.0%	3.3%	0.0%
Clay County	021900	2	2	23.0%	4.0%	0.0%
Platte County	030001	1	5	22.8%	4.0%	0.6%
Platte County	030001	2	5	22.8%	4.0%	0.6%
Platte County	030001	3	5	22.8%	4.0%	0.6%
Platte County	030001	4	5	22.8%	4.0%	0.6%
Platte County	030101	1	5	30.2%	5.0%	0.3%
Platte County	030101	2	5	30.2%	5.0%	0.3%
Platte County	030101	2	5	30.2%	5.0%	0.3%
Platte County	030102	1	6	19.1%	3.5%	4.2%
Platte County	030103	1	4	16.8%	2.2%	2.9%
Platte County	030103	1	4	16.8%	2.2%	2.9%
Platte County	030103	1	5	16.8%	3.1%	2.9%
Platte County	030201	1	1	11.6%	1.4%	0.3%
Platte County	030201	1	3	11.6%	2.4%	0.3%
Platte County	030205	1	1	18.0%	3.3%	0.0%
Platte County	030205	2	1	18.0%	3.3%	0.0%
Platte County	030205	2	1	18.0%	3.3%	0.0%
Platte County	030206	1	1	16.8%	3.1%	0.0%
Platte County	030207	1	5	19.7%	3.5%	2.0%
Platte County	030207	2	5	19.7%	3.5%	2.0%
Platte County	030207	2	5	19.7%	3.5%	2.0%
Platte County	030207	3	5	19.7%	3.5%	2.0%
Platte County	030207	4	5	19.7%	3.5%	2.0%
Platte County	030208	1	3	16.4%	2.1%	0.3%
Platte County	030208	1	3	16.4%	3.1%	0.3%
Platte County	030208	1	3	16.4%	3.1%	0.3%
Platte County	030209	1	6	26.2%	4.5%	2.1%
Platte County	030209	1	6	26.2%	4.5%	2.1%
Platte County	030209	2	6	26.2%	4.5%	2.1%
Platte County	030209	2	6	26.2%	4.5%	2.1%
Platte County	030209	2	6	26.2%	4.5%	2.1%
Platte County	030209	3	6	26.2%	4.5%	2.1%
Platte County	030304	1	5	22.6%	3.0%	4.1%
Platte County	030304	1	6	22.6%	4.0%	4.1%
Platte County	030304	1	6	22.6%	4.0%	4.1%
Platte County	030304	1	6	22.6%	4.0%	4.1%
Platte County	030304	1	6	22.6%	4.0%	4.1%

COUNTY	TRACT	BLOCK GROUP	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	HMDA HIGH COST LOAN RATE (% OF LOANS THAT ARE SUBPRIME)	PREDICTED 18 MONTH FORECLOSURE RATE	VACANCY RATE PER THE POST OFFICE RECORDS
Platte County	030304	2	6	22.6%	4.0%	4.1%
Platte County	030305	1	6	20.1%	3.6%	5.8%
Platte County	030306	1	1	9.9%	2.2%	0.0%
Platte County	030600	1	4	23.8%	4.1%	0.1%
Platte County	030600	1	4	23.8%	4.1%	0.1%
Platte County	030600	6	4	23.8%	4.1%	0.1%
Platte County	030600	6	4	23.8%	4.1%	0.1%
Cass County	060100	1	10	50.0%	7.8%	10.2%
Cass County	060100	2	9	50.0%	7.0%	10.2%



#### (8) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

For housing related activities, include:

- tenure of beneficiaries--rental or homeownership;
- duration or term of assistance;
- a description of how the design of the activity will ensure continued affordability.

For acquisition activities, include:

discount rate

For financing activities, include:

· range of interest rates

This activity address es the areas of the greatest need by providing incentives that encourage the reuse of abandoned homes. Income-qualified persons will benefit through the activity and special attention will ensure that at least \$1,830,934 will be used for housing for persons at or below 50% of median income.

Activities are intended to stimulate the private market to a higher level of activity. There are some investors and developers purchasing and renovating property for resale or to use as rental property until the market improves.

Requests for proposals will be solicited from interested developers and community development corporations. Funding may be provided in the form of loans for acquisition and rehabilitation. Restrictions pertaining to acquisition discounts, affordability periods, and program income will be explained and included in contracts and agreements that are established to fund projects. These restrictions include a purchase discount of at least 5% and an average of 15% as required by the NSP. Additional restrictions include obtaining an appraisal of the property within 60 days of the offer to purchase, and that if selling a rehabilitated property to an owner occupant, the sales price cannot be more than the amount spent to acquire and renovate the property, will also explained and included in contract language.

The request for proposal process to be used is similar to the process used for consideration of low income housing tax credit projects. Proposers will be expected to provide a pro forma showing the anticipated costs for their projects and other sources of funding to be used as leverage.

Proposers shall follow Section 3 requirements to ensure area residents have first consideration for jobs created by the program activity.

Projected schedule for Requests for Proposals (assuming HUD approval by January 2009):

Request for Proposals issued	February 2009
Workshops to explain program requirements	February 2009
Proposals received	March 2009
Funding awards announced	April 2009
Agreements executed	May 2009

Process repeats as needed

Some rental of rehabilitated property is anticipated. There has been mixed public input on this issue. Some believe it will be difficult for families at or below 50% of AMI to purchase homes and that rental of properties will be needed to provide the required housing units. Others argue that many neighborhoods already have a high ratio of rental property to owner occupied and that additional rental property will not have a stabilizing effect. Recognizing the sound basis for both arguments, we will include rental of single family housing units as an acceptable use of funds, but give priority to arrangements that lead to the tenant later purchasing the property.

Funding will also be provided in the form of soft second mortgages to increase the size of the market for rehabilitated homes. Second mortgages will help ensure homes remain affordable during the affordability period and may include deferred principle payments. We will seek to partner with lenders who can service the second mortgage along with the first.

There has already been interest expressed by potential partners. Habitat for Humanity, for example, is anticipated to respond to a request for proposals to construct new houses on vacant lots as a redevelopment project, or to renovate existing houses. Housing Authority of Kansas City (HAKC) staff report that 75% to 80% of the participants in the HAKC homeownership program are at or below 50% AMI. In order for a newly constructed housing unit to count towards the requirement that 25% of the funds be used for low income families, however, it is recognized that funds used for these housing units can only be counted when new construction follows the acquisition and demolition of a structure on foreclosed property.

Interest rates on loans and soft seconds will range from 0% to 6% and may include deferred principal payments.

When included as part of a request for proposals, the maximum developer fees to be authorized are 14% of the cost of the total project.

Extensive marketing will be utilized to find potential buyers of properties to be acquired and rehabilitated. Whenever possible, a buyer will be matched up with a home in advance of the renovation. This is to ensure a rehabilitated structure is immediately occupied upon completion. The implementation of a new homesteading program will be

explored to assist with the marketing. Marketing efforts will also be directed towards public employees.

Although credit counseling is not eligible for NSP funding, the marketing effort will coordinate efforts with non-profit credit counseling services to help prospective homebuyers qualify for mortgages, perhaps in conjunction with a lease purchase arrangement.

Because the homeowners who will purchase the homes may struggle with repairs needed in future years, participation in the City's maintenance reserve program will be required. A small amount included in the monthly mortgage payment will cover the cost of most repairs that may arise later on. This program will ensure units remain affordable and in good repair.

I. Total Budget: (Include public and private components)

Financing mechanisms benefiting low income	\$1,830,934
Financing mechanisms for moderate and middle incomes	
Total	\$5,841,361

J. Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent):

Housing units for low income	36
Housing units for moderate and middle incomes	160

# NEIGHBORHOOD STABILIZATION LAND BANK

- (1) Activity Name: Neighborhood Stabilization Land Bank
- (2) Activity Type: (include NSP eligible use & CDBG eligible activity)

Establish land banks for homes that have been foreclosed upon – eligible per 2301(c)(3)(C) and 24 CFR 570.201(a) Acquisition and (b) Disposition.

(3) <u>National Objective</u>: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., ≤ 120% of area median income).

The land bank will serve an area in which at least 51 percent of the residents have incomes at or below 120 percent of area median income (LMMA).

(4) Projected Start Date: May 1, 2009

(5) Projected End Date: April 30, 2013

The projected end date is beyond the four-year period in which NSP funds must be expended. After the four-year period, either ongoing maintenance of land bank properties will be paid with program income or other sources of funds or the inventory of properties will be liquidated at the end of the four-year period and the program will end at that time.

(6) <u>Responsible Organization</u>: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

Shirley Winn, CPM
Housing Administrator
City Planning and Development Department
14th Floor, City Hall, 414 East 12th Street
Kansas City, Missouri 64106
816.513.2907 office
816.513.2808 fax

An entity to manage the land bank will be selected through a request for proposals (RFP) process. The projected schedule is:

February 1, 2009 RFP issued.

March 1, 2009 Review of proposals.

April 1, 2009 Selection of land bank entity.

May 1, 2009 Operations begin.

We will also explore participating with the National Community Stabilization Trust (NCST), which has been formed by Enterprise Community Partners, the Housing Partnership Network, the Local Initiatives Support Corporation, and NeighborWorks America. The Trust will coordinate the transfer of real estate owned (REO) properties from financial institutions nationwide to local housing organizations, in collaboration with state and local governments. It is unknown at this time if the NCST will operate in Kansas City.

(7) <u>Location Description</u>: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

The land bank will operate within one or more of the census tracts listed in Attachment B and shown on the map on page 12.

# (8) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity

will be used to meet the low income housing requirement for those below 50% of area median income.

For housing related activities, include:

- tenure of beneficiaries--rental or homeownership;
- duration or term of assistance;
- a description of how the design of the activity will ensure continued affordability.

For acquisition activities, include:

discount rate

For financing activities, include:

range of interest rates

The activity will address areas of the highest need in Kansas City, Missouri focusing on those that are weak market areas. Due to previous deterioration of conditions, these areas are characterized by numerous vacant lots. Stabilization will require targeted redevelopment projects.

The land bank will assess all vacant and abandoned residential structures in the target areas and determine which ones are blighted, not occupiable, and not feasible to repair. These structures will be demolished. Demolition costs will be charged to owners of the properties on which structures are demolished in accordance with the Kansas City, Missouri Property Maintenance Code. There will be program income to help sustain the activity.

Acquisition will be conducted in a manner that complies with NSP requirements, including obtaining appraisals within 60 days of offers to purchase, and purchasing at a discount of at least 5% and at an overall average of at least 15%.

The target areas will be assessed for the potential for smaller redevelopment project areas. Property will be acquired as needed to support specific redevelopment projects. The properties will mostly be vacant lots. The inventory of properties obtained will be maintained in compliance with city property maintenance and nuisance codes until they are sold and used in conjunction with a redevelopment project.

# <u>I. Total Budget</u>: (Include public and private components)

Demolition	\$300,000
Vacant property acquisition	
Ongoing property maintenance	
Activity delivery costs, including inspection activity	
Total:	

J. Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent):

# PROGRAM ADMINISTRATION

- (1) Activity Name: Program Administration
- (2) Activity Type: (include NSP eligible use & CDBG eligible activity)

General administration and planning activities as defined at 24 CFR 570.205 and 206.

(3) <u>National Objective</u>: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e.,  $\leq 120\%$  of area median income).

Benefiting low, moderate, and middle income persons.

(4) Projected Start Date:

March 1, 2009

(5) Projected End Date:

April 30, 2013

(6) <u>Responsible Organization</u>: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

Shirley Winn, CPM
Housing Administrator
City Planning and Development Department
14th Floor, City Hall, 414 East 12th Street
Kansas City, Missouri 64106
816.513.2907 office
816.513.2808 fax

(7) <u>Location Description</u>: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

All areas where other NSP activities are operating. See Attachment B and the map on page 12.

# (8) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

For housing related activities, include:

- tenure of beneficiaries--rental or homeownership;
- duration or term of assistance:
- a description of how the design of the activity will ensure continued affordability.

For acquisition activities, include:

discount rate

For financing activities, include:

range of interest rates

Activities are those necessary to plan and administer the program and include preparing plan documents and reports, monitoring expenses, preparing contracts, and other activities as described in 24 CFR 570.205 and 206.

<u>I. Total Budget</u>: (Include public and private components)

\$732,373.00

J. Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent):

Performance will be measured by the success of program activities, timeliness of submitting required reports, and findings related to the program during A-133 audits and HUD monitoring activities. Detailed performance measures regarding successful administration of the program will be recommended by staff and ratified by the City Council.

APPLICATION FOR			OMB Appr	oved No. 3076-0006	2		Version 7/03
FEDERAL ASSISTANCE	Ε		2. DATE SUBMITTED December 1, 2008		Applicant Ide	ntifier	
1. TYPE OF SUBMISSION:			3. DATE RECEIVED B	Y STATE	State Applica	tion Identifier	
Application	Pre-applica		4. DATE RECEIVED BY FEDERAL AGENCY		Federal Ident	ifier	
☐ Construction  ✓ Non-Construction	Oonstru Non-Con						
5. APPLICANT INFORMATION	Non-Con	struction					
Legal Name:	,			Organizational Un	t:		
City of Kansas City MO				Department: City Development I	Division		
Organizational DUNS: 0731-34-231				Division: Housing			
Address:				Name and telepho		erson to be contacte	d on matters
Street:				involving this appl Prefix:	First Name:	ea code)	
414 E. 12th Street 14th Floor					Shirley		
City: Kansas City				Middle Name			
County: Jackson				Last Name Winn			
State:	Zip Code 64106			Suffix:		- 7	
Missouri Country:	64106			Email:			
USA	NI NIIMBED	(E1A1) -		Shirley_Winn@kcm		Fax Number (street	van anda)
6. EMPLOYER IDENTIFICATION		(EIIV):		Phone Number (give	area code)	Fax Number (give ar	ea code)
44-6000201				(816) 513-2907	CANT (C	(816) 513-2808	T
8. TYPE OF APPLICATION:			□ <b>□</b> · · ·	7. TYPE OF APPLI	CANT: (See bad	k of form for Applicati	on Types)
If Revision, enter appropriate let	ter(s) in box(e	ontinuations)	n Revision	Municipal			
(See back of form for description	of letters.)	П	П	Other (specify)			
Other (specify)				9. NAME OF FEDE Housing and Urban			
10. CATALOG OF FEDERAL	DOMESTIC A	SSISTAN	CE NUMBER:			CANT'S PROJECT:	
			1 4-2 1 8	Neighborhood Stab	ilization Program		
TITLE (Name of Program): NSP Neighborhood Stabilizatio	D						
12. AREAS AFFECTED BY PR		s. Counties	s. States. etc.):	-			
Kansas City, Missouri		,	,,				
13. PROPOSED PROJECT				14. CONGRESSION	AL DISTRICTS	OF:	
Start Date:	Ending Da April 30, 2			a. Applicant Missouri 5th & 6th D	Nietriet	b. Project MO-005 and MO 00	16
March 1, 2009  15. ESTIMATED FUNDING:	April 30, 2	2019				REVIEW BY STATE	
			00	ODDED 42272 DDO	CECCO		
a. Federal \$			7,323,734	a. Yes. AVAILA	BLE TO THE ST	N/APPLICATION WAS	RDER 12372
b. Applicant \$			.00	PROCE	SS FOR REVIE	W ON	
c. State \$			.00	DATE:			
d. Local \$		-	.00	b. No. PROGR	AM IS NOT CO	/ERED BY E. O. 1237	72
e. Other \$			.00	_	OGRAM HAS NO	T BEEN SELECTED	BY STATE
f. Program Income \$			00	FOR RE	VIEW	NT ON ANY FEDERA	
g. TOTAL \$			3,000,000				AL DEDT.
			10,323,734	Yes If "Yes" atta			4
18. TO THE BEST OF MY KNO DOCUMENT HAS BEEN DULY ATTACHED ASSURANCES IF	<b>AUTHORIZE</b>	D BY THE	<b>GOVERNING BODY OF</b>				
a. Authorized Representative				berta	- Name		
Prefix	First Name Tom				le Name		
Last Name Coyle				Suffix	(		
b. Title Director, City Development Divi	sión				lephone Number	(give area code)	
d. Signature of Authorized Repre	sentative			(816 e. Da	) 513-2865 Ite Signed	1.1.	
Previous Edition Usable	70					/ 4- o 8 Standard Form 42	4 (Rev 0_2002)
Authorized for Local Reproduction	on					Prescribed by OMB	

# NSP GRANT SUBMISSION TEMPLATE & CHECKLIST

NSP grant allocations can be requested by submitting a paper NSP Substantial Amendment or a form under the Disaster Recovery Grant Reporting (DRGR) system. This template sets forth the suggested format for grantees under the NSP Program. A complete submission contains the information requested below, including:

- (1) The NSP Substantial Amendment (attached below)
- (2) Signed and Dated Certifications (attached below)
- (3) Signed and Dated SF-424.

<u>Grantees should also attach a completed NSP Substantial Amendment Checklist to ensure completeness and efficiency of review</u> (attached below).

# SPECIAL NOTE TO THOSE REVIEWING THIS DRAFT PLAN

This document is a form developed by HUD for grantees to use for submitting their plans for the use of NSP funds. Lettering in black font are the instructions and information contained on the HUD form. Lettering in blue font is the City's response to the information requested.

# THE NSP SUBSTANTIAL AMENDMENT

Jurisdiction(s):NSP Contact Person:Shirley WinnCity of Kansas City, MissouriAddress:414 E 12th, 14th floorTelephone:816-513-2907Jurisdiction Web Address:Fax:816-513-2808www.kcmo.org/neighEmail:Shirley Winn@kcmo.org

#### A. AREAS OF GREATEST NEED

Provide summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction.

**Note:** An NSP substantial amendment must include the needs of the entire jurisdiction(s) covered by the program; states must include the needs of communities receiving their own NSP allocation. To include the needs of an entitlement community, the State may either incorporate an entitlement jurisdiction's consolidated plan and NSP needs by reference and hyperlink on the Internet, or state the needs for that jurisdiction in the State's own plan. The lead entity for a joint program may likewise incorporate the consolidated plan and needs of other participating entitlement jurisdictions' consolidated plans by reference and hyperlink or state the needs for each jurisdiction in the lead entity's own plan.

HUD has developed a foreclosure and abandonment risk score to assist grantees in targeting the areas of greatest need within their jurisdictions. Grantees may wish to consult this data, in developing this section of the Substantial Amendment.

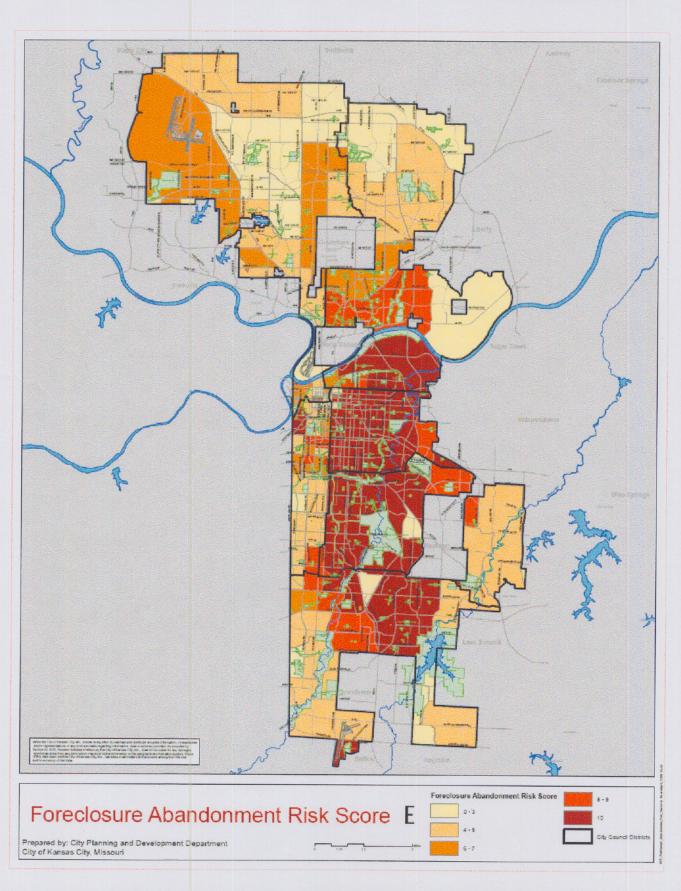
# Response:

Foreclosures have hit Kansas City hard. A recent check of RealtyTrac revealed over 3,900 bank-owned properties in the city and 745 in pre-foreclosure proceedings. The foreclosure and abandonment risk scores provided by HUD also show the extent of the impact. Of 568 census tracts in Kansas City, 235 or 41% received the highest risk score of "10". Funds will be targeted to census tracts with a risk score of 10. This includes census tracts in Council Districts 1, 3, 4, 5, and 6.

A table of the data utilized to determine the area of the greatest need is included as Attachment A

The map below shows the geographic distribution of these census tracts.

GPD 108NOV26 PM12:11



#### B. DISTRIBUTION AND USES OF FUNDS

Provide a narrative describing how the distribution and uses of the grantee's NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures. *Note*: The grantee's narrative must address these three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

## Response:

HUD developed the estimated foreclosure risk score based upon the percentage of home foreclosures, the percentage of homes financed by a subprime mortgage related loan, and the predicted foreclosure rate in the next 18 months. Census tracts were rated on a scale of one to ten, with ten being the highest risk score. Census tracts that received the highest risk score of ten were determined to be the areas of the greatest need in Kansas City, Missouri.

A table listing the census tracts and data used in this determination is found in Attachment A.

The distribution and use of funds as described here and in more detail later will address the areas of the greatest need. Activities will be targeted to areas shown in the series of maps presented below. Although all areas of greatest need in Kansas City are categorized as highest risk in the score developed by HUD, there are areas that can be categorized as weak market areas and others as medium market areas.

Weak market areas are characterized by signs of abandonment that were present before foreclosures lead to further decline. Vacant lots are numerous. Code violations and other blighting conditions are present. Property values are very low.

Funds and activities related to land banking and demolition will be strategically focused in weak market areas within the larger target area. The goal is to demolish buildings when the potential for rehabilitation and resale is nonexistent. Vacant land can then be assembled for redevelopment projects.

Because we have limited experience with land banking, we intend to start out on a relatively small scale. If it proves to be successful, an amendment to expand the activity will be submitted.

Property values are slightly higher in medium market areas. Vacant lots are not numerous. The strategy for these areas is to provide incentives that will facilitate the

reuse of abandoned homes. We want to avoid demolition whenever possible and encourage construction of replacement structures when demolition is necessary.

It should also be noted that while NSP funds cannot be used for foreclosure prevention activities, we intend to support those activities through other resources. Funding is already provided to at least three agencies that provide housing counseling services, including foreclosure prevention guidance. Foreclosure prevention will continue to play an important role in our overall strategy.

#### C. DEFINITIONS AND DESCRIPTIONS

(1) Definition of "blighted structure" in context of state or local law.

# Response:

Blighted structures may be demolished in areas designated for land banking activity. Because some of the structures may remain under private ownership at the time of demolition, the definition of blighted structure needs to agree with the definition of a dangerous building as found in the Kansas City, Missouri Property Maintenance Code:

#### Sec. 56-532. Dangerous buildings or structures.

- (a) Dangerous buildings defined. All buildings or structures, portions or parts of a building or remains of a building or structure which may have any of the defects enumerated herein or in the building code shall be deemed a dangerous building and a nuisance provided that such conditions or defects exist to the extent that they are detrimental to the life, health, property, safety or welfare of the public, or its occupants are endangered. A building is a dangerous building whenever:
- (1) The exterior walls or other vertical structural members list, lean or buckle to such an extent that a plumb line passing through the center of gravity does not fall inside the middle one-third of the base.
- (2) A portion thereof has wrecked, warped, buckled or settled to such an extent that walls or other structural portions have materially less resistance to winds or snow than is required in the case of similar new construction.
- (3) The building or structure, or any portion thereof, because of dilapidation, deterioration, decay, vandalism or faulty construction or the removal, movement or instability of any portion of the ground necessary for the purpose of supporting such building or the deterioration, decay or inadequacy of its foundation or any other cause is likely to partially or completely collapse.
- (4) The building or structure, exclusive of the foundation, shows substantial damage or deterioration of the supporting or nonsupporting members, or enclosing or outside walls or wall coverings.
- (5) The building or structure has improperly distributed loads upon the floors or roofs, or in which the same are overloaded or which have insufficient strength to be reasonably safe for the purpose used.
- (6) A portion of the building has been damaged by fire, earthquake, tornado, wind, flood, vandals or any other cause, to such an extent that the structural strength or stability thereof is materially less than it was before such catastrophe or damage and is less than the minimum requirements of the building code for similar new construction.

- (7) A door, aisle, passageway, stairway, fire escape or other means of egress is not of sufficient width or size, or is damaged, dilapidated, obstructed or otherwise unusable, or so arranged so as not to provide safe and adequate means of egress in case of fire or panic.
- (8) A portion of the building or member or appurtenance thereof (e.g., porch, chimney, signs) is likely to fail, or to become detached or dislodged, or to collapse and thereby injure persons or damage property.
- (9) The building or structure has any portion, member or appurtenance, ornamentation on the exterior thereof which is not of sufficient strength or stability, or is not so anchored, attached or fastened in place so as to be capable of safely resisting wind pressure, or snow or other loads.
- (10) The building or structure, because of inadequate maintenance, dilapidation, decay, damage, faulty construction or arrangement, trash, filth, inadequate light, air ventilation or sanitation facilities, or otherwise is determined to be unsafe, unsanitary, unfit for human habitation, or in such a condition that is likely to cause sickness or disease.
- (11) For any reason, the building or structure, or any portion thereof, is manifestly unsafe for the purpose for which it is being used.
- (12) The building or structure or land it occupies exists or is maintained in violation of any specific requirement or prohibition applicable to such building or structure or land provided by this article or other applicable laws or ordinances of this state or city relating to the condition, use, location, maintenance of the building, structures or land.
- (13) The building or structure has become an attractive nuisance to children or is open to unauthorized or unlawful entry.
- (14) The building or structure because of obsolescence, dilapidated condition, deterioration, damage, trash and debris, unsafe exits, lack of sufficient fire-resistive construction, unsafe electrical wiring, gas connections, or heating apparatus, previous fires or any other cause is determined to be a fire hazard or is a fire hazard under chapter 26.
- (15) The electrical system is totally or partially damaged, destroyed, removed or otherwise made inoperable, unsafe or hazardous.
- (16) The plumbing system is totally or partially damaged, destroyed, removed or otherwise made inoperable or unsanitary.
- (17) The mechanical system or any portion of the mechanical system is totally or partially damaged, destroyed, removed or otherwise made inoperable or unsafe.
- (18) The building or structure, because of obsolescence, dilapidated condition, deterioration or damage, is detrimental to the sale, loan or taxable values of surrounding properties or which renders such surrounding properties uninsurable or which constitutes a blighting influence upon the neighborhood or which constitutes an eyesore so as to deprive owners or occupants of neighboring property of the beneficial use and enjoyment of their premises or which presents an appearance which is offensive to persons of ordinary sensibilities.
- (19) The building or structure is in such condition as to constitute a public nuisance known to the common law or in equity jurisprudence.
- (20) A portion of a building or structure remains on a site when construction or demolition work is abandoned.

(2) Definition of "affordable rents." *Note:* Grantees may use the definition they have adopted for their CDBG program but should review their existing definition to ensure compliance with NSP program –specific requirements such as continued affordability.

# Response:

Rental rates published by HUD as high and low HOME rates will be used to define affordable rents under the program. The low HOME rent limit is the maximum rent for families whose incomes are equal to or lower than 50% of the median income. The high HOME rents are the maximum rents for families whose income exceeds 50% of the median income.

	2008 HOME PROGRAM RENTS						
	Efficiency	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Low HOME Rent Limit	547	641	754	889	991	1094	1197
High HOME Rent Limit	547	657	754	1020	1073	1234	1395

(3) Describe how the grantee will ensure continued affordability for NSP assisted housing.

## Response:

Continued affordability will be a component of all financing instruments, including soft seconds and similar mortgage assistance measures. Terms for loans will be set to cover the period of affordability and require documentation sufficient to ensure units have remained affordable to the target population.

HOME affordability guidelines will be utilized to determine the period of affordability.

We will also explore using community land trusts as a method of ensuring continued affordability.

(4) Describe housing rehabilitation standards that will apply to NSP assisted activities.

#### Response:

Housing renovated under the NSP will be brought into compliance with the Kansas City, Missouri Property Maintenance Code (Chapter 56, Code of General Ordinances). The Building Code (Chapter 18, Code of General Ordinances) will also apply whenever a building permit is required.

The rehabilitation standards will also incorporate green building and energy-efficiency improvements as encouraged by HUD and required by city ordinance. City ordinance No. 080543 requires the following language be included in all request for proposals:

All new and gut rehabilitation residential buildings up to three stories shall be designed to meet the standard for Energy Star Qualified New Homes (achieving a rating of equal to or less than 85 on the Home Energy Rating System Rating Scale). All procedures used for this rating shall comply with National Home Energy Rating System guidelines.

The City ordinance further states that for all new and gut rehabilitation residential buildings up to three stories, sub-recipients will be required to ensure compliance with these stated objectives through inspections by third party, HERS certified contractors.

#### D. LOW INCOME TARGETING

Identify the estimated amount of funds appropriated or otherwise made available under the NSP to be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income: \$67,600.

*Note*: At least 25% of funds must be used for housing individuals and families whose incomes do not exceed 50 percent of area median income.

#### Response:

Our goal is to exceed 25% (\$1,830,934) of the funds for housing individuals or families whose incomes do not exceed 50 percent of the area median income.

#### FY 2008 Income Limits for 50% of HUD Area Median Income

1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
household							
\$23,950	\$27,350	\$30,800	\$34,200	\$36,950	\$39,650	\$42,400	\$45,150

Many low income families live in Kansas City and especially in the areas heavily impacted by foreclosures. Therefore, our goal will be to exceed the required minimum in order to provide assistance for these families.

#### E. ACQUISITIONS & RELOCATION

Indicate whether grantee intends to demolish or convert any low- and moderate-income dwelling units (i.e.,  $\leq 80\%$  of area median income).

#### If so, include:

- The number of low- and moderate-income dwelling units—i.e., ≤ 80% of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e.,  $\leq 120\%$  of area median income—reasonably expected to be produced by activity and income level as provided for

- in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.

# Response:

We do not intend to demolish or convert any low- and moderate-income dwelling units. The information requested is as an alternative requirement to 42 U.S.C. 5304(d)(2)(A)(i) and (ii), which pertains to demolition or conversion of occupied or vacant occupiable lower income dwelling units. Demolition or conversion activity will be limited to vacant and non-occupiable housing units.

#### F. PUBLIC COMMENT

Provide a summary of public comments received to the proposed NSP Substantial Amendment.

#### Response:

A website was established on October 17, 2008:

(http://www.kcmo.org/neigh.nsf/web/HUDNSP?opendocument). Public comments were received at the Third District Council meeting on October 13, 2008. Information regarding the program occurred at a meeting of the city council housing committee on October 22, 2008. Public testimony was received at meetings of the city council housing committee on October 29, 2008, and November 5, 2008.

# G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

# FINANCING OF ACQUISITION AND REHABILITATION

(1) Activity Name: Financing of Acquisition and Rehabilitation

(2) Activity Type: (include NSP eligible use & CDBG eligible activity)

Establish financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-seconds, loan loss reserves, and shared equity loans for low- and moderate-income homebuyers. Also, 24 CFR 570.201(a) Acquisition, (b) Disposition, and (n) Direct homeownership assistance.

(3) <u>National Objective</u>: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e.,  $\leq 120\%$  of area median income).

Provides or improves, through financing mechanisms, permanent residential structures that will be occupied by a household whose income is at or below 120% of area median income, with at least 25%, or \$1,830,934, used for housing to be occupied by households whose incomes are at or below 50% of area median income.

#### FY 2008 Income Limits for 50% of HUD Area Median Income

1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
household							
\$23,950	\$27,350	\$30,800	\$34,200	\$36,950	\$39,650	\$42,400	\$45,150

#### FY 2008 Income Limits for 120% of HUD Area Median Income

1 person	(A)	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	4 person		6 person	7 person	8 person	
household	household	household	household	household	household	household	household	
\$57,450	\$65,650	\$73,850	\$82,100	\$88,650	\$95,200	\$101,800	\$108,350	

(4) Projected Start Date: April 2009

(5) Projected End Date: April 2013

(6) <u>Responsible Organization</u>: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

Shirley Winn, CPM Housing Administrator City Planning and Development Department 14th Floor, City Hall, 414 East 12th Street Kansas City, Missouri 64106 816.513.2907 office 816.513.2808 fax

(7) <u>Location Description</u>: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

Financing mechanisms utilized in this activity will be available in every census tract in Kansas City with a risk score of 10 per the data provided by HUD and where at least 51% of the residents have annual incomes of 120% of the area median income or below. See the map on the next page. A list of the census tracts and block groups within the tracts is found in Attachment B.