

Gwinnett County, Georgia

Application to

Georgia Department of Community Affairs

For

Reservation of Funds

Neighborhood Stabilization Program

Direct Allocation Pool

January 15, 2009

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Department of Financial Services
Budget Division

75 Langley Drive • Lawrenceville, GA 30045-6900
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gwinnettcounty

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January 14, 2009

Mr. Brian Williamson
Assistant Commissioner
Georgia Department of Community Affairs
60 Executive Park South, N.E.
Atlanta, Georgia 30329-2231

Re: Request for NSP Direct Allocation Pool Funds

Attention: Mr. Glenn Misner

Dear Mr. Williamson:

Attached is the Gwinnett County Application for Reservation of Funds under the Direct Allocation Pool of DCA's Neighborhood Stabilization Program [NSP]. The application requests \$3,004,227, which represents the full amount of the allocation for Gwinnett County, as described in DCA's NSP Substantive Amendment submitted to HUD.

This submission consists of:

1. Signed SF – 424;
2. Completed application template, including documentation on the Public Participation process and signed Certifications;
3. A copy of the Substantive Amendment to Gwinnett County's Action Plan 2008 submitted to HUD;
4. Letter to DCA requesting available reallocated NSP funds;
5. Letter of commitment to DCA for NSP and non-NSP loan funds; and
6. Authorization to Sign Documents – Gwinnett County Board of Commissioners.

If you have questions regarding this request for reallocated NSP funds, please contact Craig Goebel at the Gwinnett County Community Development Program at 770-822-5190 or craig.goebel@gwinnettcounty.com.

Sincerely,

Maria Woods

Maria Woods
Acting Director of Financial Services

cc: Craig Goebel, Director, Gwinnett County Community Development Program

APPROVED AS TO FORM:
Wendy K. Wells
DEPUTY COUNTY ATTORNEY

PROPOSED
NEIGHBORHOOD STABILIZATION PROGRAM
APPLICATION FOR RESERVATION OF FUNDS
STATE OF GEORGIA
ACTION PLAN

<p>Jurisdiction(s): <u>Gwinnett County, GA</u> <i>(identify lead entity in case of joint agreements)</i> Community Development Program [Department of Financial Services]</p> <p>Jurisdiction Web Address: www.gwinnettcounty.com <i>(URL where NSP Substantial Amendment materials are posted)</i></p>	<p>NSP Contact Persons: <u>Craig Goebel, Director</u></p> <p>Address: <u>Gwinnett County Comm. Dev. Program</u> <u>575 Old Norcross Road, Suite A</u> <u>Lawrenceville, GA 30045-4367</u></p> <p>Telephone: <u>(770) 822-5190</u> Fax: <u>(770) 822-5193</u> Email: <u>craig.goebel@gwinnettcounty.com</u></p>
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THE STATE OF GEORGIA WILL ACCEPT REQUESTS FOR RESERVATION OF FUNDS UNDER TITLE III OF THE HOUSING AND ECONOMIC RECOVERY ACT (HERA) SEC. 2301 ENTITLED “EMERGENCY ASSISTANCE FOR THE REDEVELOPMENT OF ABANDONED AND FORECLOSED HOMES”.

A. AREAS OF GREATEST NEED

Provide summary needs data identifying the geographic areas of greatest need in the applicant’s jurisdiction.

Note: The local jurisdiction must identify the area(s) of greatest need(s) and provide analysis of contributing factors that created the need described.

Response:

Areas of Greatest Need in Gwinnett County

Gwinnett County is using, initially, the HUD-provided foreclosure and abandonment risk score to identify the areas within Gwinnett County which are its “areas of greatest need.” The risk scores were ranked by HUD from 1-10, with 1 being the areas with the lowest foreclosure and abandonment risk and with 10 being the areas with the highest foreclosure and abandonment risk. Table 1, beginning on Page 3, depicts the scores ranked from highest to lowest [from 10 down to 5].

Gwinnett County has determined that all Census Tracts with foreclosure and abandonment risk scores of 5 and higher are included as “areas of greatest need.” First priority investments of NSP funds from

DCA shall be made in Census Tracts with scores of 8 and higher, as depicted as the darkest shading [pink color] on Map 1, Page 11. The lighter shading [yellow color] represent secondary priority investment areas, and are those Census Tracts which have scores of 5-7. The tan colored Census Tracts on Map 1 had foreclosure and abandonment risk scores of less than 5 and are not targeted for NSP investments.

First priority investment areas are concentrated in northeast Gwinnett County [City of Buford], central Gwinnett County from DeKalb County eastward into the Lawrenceville area, and in the area of Gwinnett County south of the City of Snellville.

The foreclosure and abandonment risk targeted areas will be supplemented by actual foreclosure information which is collected from local, state and national data sources. These actual data will be overlaid onto a County map as actual addresses of eligible foreclosed properties are identified.

Initially, Gwinnett County planned to use information obtained from Tax Commissioner records to identify/locate residential foreclosures. However, recent investigations have determined that data sources such as FMLS, Realtytrac, FHA, and Fannie Mae may provide more complete and more current data. The information obtained from the Tax Commissioner's staff was interesting but somewhat limiting as it only reflected foreclosure filings, but information from commercial sources such as FMLS, Realtytrac.com, and the Mortgage Bankers Association will be used to help supplement the foreclosure risk areas identified by HUD, thereby documenting the actual incidences of foreclosures as well the concentrations of sub-prime mortgage loans. Local tax data will be used to supplement these types of information. Inventories of foreclosed residential properties will be overlaid onto the areas with sub-prime mortgage concentrations to magnify the impact of moving these foreclosed vacant properties back into homeownership.

Gwinnett County will use NSP funds to acquire/rehabilitate foreclosed residential properties in the areas where sub-prime mortgage loans have been concentrated. The investment of NSP funds in areas with high concentrations of sub-prime loans will be combined with affordable fixed rate private mortgages which are determined not be sub-prime financial instruments.

Homebuyers and homeowners who live in areas with high concentrations of sub-prime mortgages will be encouraged to take advantage of housing counseling services made available to residents of the County and which will help these homeowners understand the mortgage financing process.

TABLE 1

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050709	3	9
050709	4	9
050709	3	9
050709	4	9
050422	5	9
050422	5	9
050422	6	9
050716	1	9
050716	2	9
050716	3	9
050717	2	9
050717	1	9
050717	1	9
050717	2	9
050717	3	9
050105	2	9
050105	1	9
050105	2	9
050105	4	9
050105	2	9
050105	1	9
050105	4	9
050105	2	9
050105	1	9
050105	2	9
050522	6	9
050522	8	9
050417	1	9
050417	2	9
050522	8	9
050421	1	9
050421	1	9
050421	3	9
050416	1	8
050416	1	8
050416	3	8
050416	6	8

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050518	3	8
050518	4	8
050518	6	8
050721	6	8
050721	7	8
050721	8	8
050721	6	8
050721	7	8
050721	8	8
050424	1	8
050424	2	8
050704	1	8
050704	1	8
050704	1	8
050704	3	8
050704	1	8
050704	2	8
050704	4	8
050704	1	8
050704	2	8
050704	3	8
050704	4	8
050418	1	8
050418	2	8
050507	3	8
050507	7	8
050719	4	8
050719	5	8
050719	4	8
050719	5	8
050515	2	8
050515	3	8
050515	4	8
050519	4	8
050519	5	8
050519	7	8
050520	1	8
050520	2	8
050520	2	8

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050507	2	8
050507	3	8
050507	7	8
050411	3	8
050411	4	8
050411	5	8
050411	6	8
050411	1	8
050411	3	8
050411	4	8
050411	6	8
050423	1	8
050423	3	8
050423	4	8
050312	1	8
050312	3	8
050312	4	8
050312	6	8
050312	1	8
050312	3	8
050312	4	8
050312	6	8
050520	1	8
050410	1	8
050410	4	8
050410	5	8
050410	1	8
050410	4	8
050410	5	8
050509	2	7
050509	1	7
050509	2	7
050509	4	7
050509	2	7
050509	3	7
050509	4	7
050509	1	7
050509	2	7
050509	3	7
050509	4	7

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050419	1	7
050419	2	7
050419	5	7
050415	3	7
050415	6	7
050415	1	7
050415	2	7
050415	3	7
050415	6	7
050521	3	7
050521	4	7
050521	5	7
050512	1	7
050512	2	7
050512	1	7
050512	2	7
050512	3	7
050511	2	7
050511	1	7
050511	2	7
050511	1	7
050511	2	7
050516	1	7
050516	2	7
050516	5	7
050306	1	7
050306	1	7
050306	2	7
050316	1	7
050316	3	7
050316	4	7
050316	7	7
050705	1	7
050313	1	7
050313	2	7
050313	5	7
050313	7	7
050313	1	7

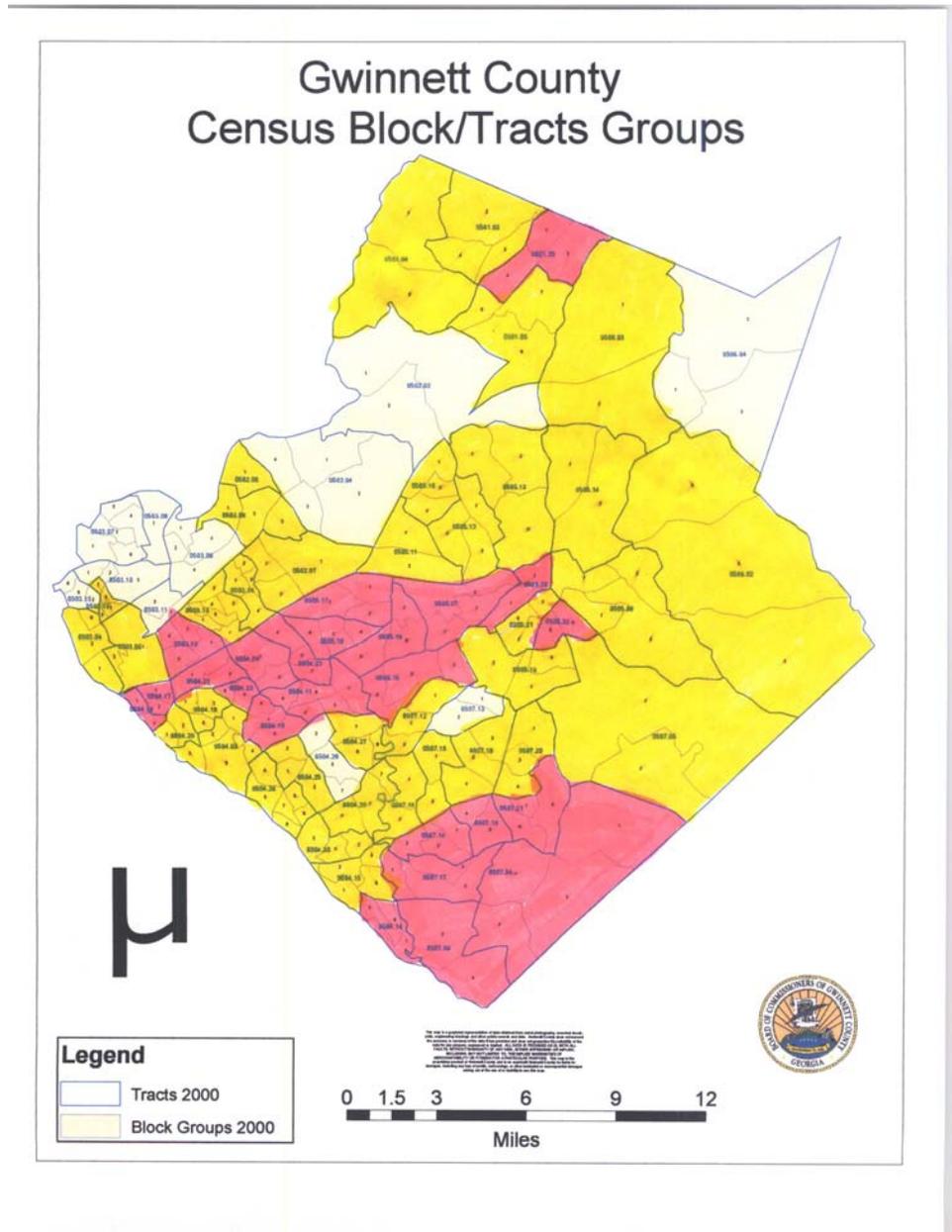
Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050313	2	7
050313	3	7
050313	4	7
050313	5	7
050313	7	7
050516	1	7
050516	2	7
050516	5	7
050103	2	7
050103	3	7
050103	4	7
050103	2	7
050103	3	7
050103	4	7
050103	2	7
050103	2	7
050103	3	7
050103	4	7
050430	3	7
050430	5	7
050430	2	7
050314	1	6
050314	2	6
050314	3	6
050314	4	6
050517	2	6
050517	1	6
050517	2	6
050517	3	6
050420	1	6
050420	2	6
050715	1	6
050715	1	6
050715	2	6
050705	1	6
050705	2	6
050705	2	6
050705	2	6
050705	1	6
050705	2	6
050705	1	6
050705	2	6

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050705	1	6
050705	2	6
050513	3	6
050602	4	6
050602	3	6
050602	4	6
050602	3	6
050602	4	6
050602	5	6
050602	3	6
050602	4	6
050720	1	6
050720	3	6
050720	4	6
050720	1	6
050720	3	6
050720	4	6
050304	1	6
050304	2	6
050304	8	6
050514	2	6
050513	1	6
050513	1	6
050513	1	6
050513	1	6
050513	2	6
050513	3	6
050510	1	6
050510	1	6
050510	2	6
050510	3	6
050514	2	6
050514	2	6
050514	1	6
050514	2	6
050426	4	6
050426	4	6
050426	5	6
050426	6	6
050426	7	6
050426	8	6
050426	9	6
050426	4	6

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050426	5	6
050427	1	6
050427	9	6
050427	1	6
050427	6	6
050427	9	6
050207	1	6
050207	1	6
050207	2	6
050207	3	6
050207	1	6
050207	2	6
050106	6	6
050106	7	6
050106	5	6
050106	6	6
050106	7	6
050106	5	6
050106	6	6
050106	7	6
050106	6	6
050106	7	6
050106	5	6
050106	6	6
050106	7	6
050403	1	5
050403	4	5
050403	9	5
050403	1	5
050403	2	5
050403	3	5
050403	4	5
050403	9	5
050429	4	5
050429	1	5
050429	7	5
050429	1	5
050429	4	5
050429	7	5
050603	1	5
050603	1	5
050429	4	5

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050429	7	5
050603	1	5
050603	1	5
050603	1	5
050603	2	5
050603	1	5
050603	2	5
050425	1	5
050425	2	5
050425	3	5
050425	1	5
050425	3	5
050206	1	5
050206	1	5
050206	1	5
050206	1	5
050206	1	5
050206	2	5
050206	3	5
050714	1	5
050714	2	5
050714	1	5
050714	2	5
050712	3	5
050712	1	5
050712	2	5
050712	3	5
050718	1	5
050718	2	5
050718	3	5
050718	1	5
050718	2	5
050718	3	5
050205	1	5
050205	1	5
050104	7	5
050104	6	5
050104	7	5
050104	6	5
050104	7	5
050104	6	5
050104	7	5
050104	6	5
050104	7	5

MAP 1



Darkest Shaded Areas [Pink Color] are First Priority Investment Areas, Representing Census Tracts with HUD-Published Abandonment and Foreclosure Risk Scores of 8 and Higher.

Lighter Shaded Areas [Yellow Color] are Secondary Priority Investment Areas, Representing Census Tracts with HUD-Published Abandonment and Foreclosure Risk Scores of 5-7.

Unshaded Areas have Risk Scores below 5 and are not identified as target areas for NSP investments.

B. DISTRIBUTION AND USES OF FUNDS

Provide a narrative describing how the distribution and uses of the applicant'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 applicant as likely to face a significant rise in the rate of home foreclosures. *Note:* The applicant's narrative must address these three stipulated need categories in the NSP statute, but the applicant may also consider other need categories.

Response:

Since 2005, Gwinnett County has been one of three (3) counties in Georgia with the highest numbers of foreclosures of single-family owner-occupied housing. As a result of the large number of foreclosures in Gwinnett County, and the concomitant negative impact on the neighborhoods in which these structures are located, the County will utilize its NSP funds for the activities described, herein.

The NSP grant funds and any NSP Program Income received will be used to purchase and rehabilitate foreclosed single-family housing [detached housing and fee-simple townhomes], as necessary to comply with the Gwinnett County NSP Rehabilitation Standards [the HOME Program Property Standards]. Gwinnett County has adopted as its HOME Program Property Standards the Georgia Uniform Code Act [ICC Building Code, National Electrical Code, etc.], as implemented through the Gwinnett County Housing Rehabilitation Standards. The activity has been classified by HUD as a "Type B" activity under NSP rules. Priority and secondary target areas are identified on Map 1, Page 11.

The foreclosed homes purchased must be located in Census Tracts designated by Gwinnett County as "areas of greatest need" using HUD-supplied foreclosure and abandonment risk data, as updated using actual foreclosure data supplied by the Gwinnett County Tax Commissioner.

The data obtained from the Tax Commissioner was helpful but is not available in mappable formats consistent with Census boundaries. Information from the Georgia Department of Community Affairs and from commercial sources such as FMLS, Realtytrac.com, and the Mortgage Bankers Association will be used to supplement the foreclosure risk areas identified by HUD, thereby documenting the actual incidences of foreclosures and the incidences of sub-prime mortgage loans. New maps will be generated upon the initiation of NSP operations in Gwinnett County, with the assistance of Gwinnett County GIS personnel, to present the latest available information on concentrations of foreclosed properties, as well as areas with concentrations of sub-prime mortgage loans.

This targeting strategy will ensure that the NSP funds are 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 Gwinnett County as likely to face a significant rise in the rate of home foreclosures.

The rehabilitated homes will be sold to homebuyers with total household incomes which are not greater than 120% of the Area Median Income [frequently referred to as Median Family Income] for Gwinnett County.

At least 25% of the funding expended for the acquisition/rehabilitation of these homes will be limited to homes sold to persons with total household incomes which do not exceed 50% of Area Median Income.

As described in Item A, “Areas of Greatest Need,” Gwinnett County is using HUD’s “Foreclosure and Abandonment Risk Scores” as its base data for the targeting of NSP investments. This information will be supplemented by actual incidences of foreclosure obtained from public and private data sources. These combined data will permit Gwinnett County to invest its NSP funds in a manner which address the HERA requirement that NSP funds be used in “areas of greatest need” and which focus on NSP’s three targeted priorities:

1. Areas of greatest percentage of home foreclosures;
2. Areas with highest percentages of homes financed by subprime mortgage related loans; and
3. Areas identified as continuing to face the likelihood of foreclosures.

By combining HUD’s foreclosure and abandonment risk score with actual collected foreclosure data, Gwinnett County will be using the following process to address these three factors.

1. Areas of greatest percentage of home foreclosures;

Gwinnett County will select qualified asset management firms [developers, financial institutions, investors, and/or non-profit organizations] through a Request for Proposals process. The selected entities will purchase and rehabilitate vacant unoccupied foreclosed single-family residential properties in Gwinnett County’s identified areas of greatest need [priority and secondary investment areas] which are identified on Map 1, Page 11.

During the process of acquisition/rehabilitation, the Gwinnett County NSP staff will work with the asset management entities to market the NSP assisted homes. HUD-approved Housing Counseling agencies will be notified, employers of potential NSP-eligible homebuyers will be contacted [including employees such as police officers, firefighters, County/municipal/State workers, teachers and other educational system personnel, health care workers, etc.]. Additional outreach will be carried through Media Releases, information on Gwinnett County’s website, mailings, etc.

The goal is to use the participating asset management firms and a companion marketing plan is to reduce the numbers of existing vacant foreclosed homes and to create homeownership for NSP-eligible households.

2. Areas with highest percentage of homes financed by subprime mortgage related loans

Gwinnett County will examine carefully the existing inventory of foreclosed single-family residential properties in the priority and secondary investment areas to ascertain which of these properties were financed with sub-prime mortgage products. Such properties will be assessed to determine if they are candidates for NSP acquisition/rehabilitation/sale following the requirements of the NSP rules and of Gwinnett County NSP operating procedures. Available Federal, State, local, and private data sources will be used to identify the subprime properties, including Gwinnett County Superior Court Clerk, financial institutions, Fannie Mae, Freddie Mac, FHA, and other agencies, where available.

3. Areas identified as continuing to face the likelihood of foreclosures.

The NSP priority and secondary investment areas will be scrutinized to determine which of these areas are likely to experience continued occurrences of foreclosure. The NSP Program Manager for Gwinnett County is an experienced residential real-estate professional who has practiced in Gwinnett County for many years. The Program Manager is experienced with residential real estate market

analysis in Gwinnett County and is familiar with its real estate trends. This knowledge base will be a resource to help prepare for the purchase of properties in the NSP investment areas.

These maximum income levels for Gwinnett County’s NSP are reflected in Table 2, which follows:

**Table 2
NSP Maximum Income Limits – Gwinnett County, Georgia**

Household Size								
% AMI	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
50%	\$24,900	\$28,500	\$32,050	\$35,600	\$38,450	\$41,300	\$44,150	\$47,000
80%	\$39,850	\$45,550	\$51,250	\$56,950	\$61,500	\$66,050	\$70,650	\$75,200
120%	\$59,800	\$68,350	\$76,900	\$85,450	\$92,300	\$99,100	\$105,950	\$112,800

General Strategy

Gwinnett County has directed its NSP funding toward homeownership because foreclosed residential homeownership properties predominate among foreclosures in the County. Although converting foreclosures previously occupied by homeowners to rental property may represent a strategy which is appropriate for some localities to ensure that 25% of their NSP funds are expended to benefit households at 50% Area Median Income [AMI], Gwinnett County remains committed to returning foreclosed properties to affordable homeownership for all qualifying households, including those at 50% AMI. The County will provide financial support for this process through the purchase of the most affordable properties and through the use of “soft second” deferred payment mortgages and through the use of downpayment assistance. Gwinnett County Habitat for Humanity and other non-profit providers of affordable housing, will be encouraged to participate in NSP to help make this goal achievable.

Gwinnett County will monitor the progress toward meeting the 25% investment requirement as a part of its monthly and quarterly progress assessment process. Adjustments will be made in program design, including the investment of NSP funds or program income in rental housing if the homeownership model is not achieving its performance goals.

Gwinnett County proposes one primary use of its NSP funds and Program Income: Acquire and Rehabilitate Foreclosed Single-Family Housing for Sale to Qualifying Homebuyers. Six percent [6%] of the grant and program income funds will be used by Gwinnett County to administer its NSP.

The County recognizes that focusing its NSP grant funds on one activity may pose a higher potential risk than some types of NSP eligible activities; however, the NSP rules instruct recipients of NSP funds to address their “areas of greatest area.” In Gwinnett County the “areas of greatest need” are both geographic and programmatic. Geographic areas are those with the highest numbers and percentages of foreclosures, those with the greatest concentrations of sub-prime loans, and the areas with the great problems with mortgage delinquencies. Programmatic “areas of greatest need” in Gwinnett County are the vast number of foreclosed residential properties previously occupied by homeowners. The County has chosen to address this programmatic need by maximizing the use of NSP funds to help return stability to neighborhoods through the most effective mechanism: owner occupied housing financed with affordable and fair financing instruments.

C. DEFINITIONS AND DESCRIPTIONS

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

Note: For the purposes of the Georgia NSP the following definition shall apply:

Pursuant to O.C.G.A. 22-1-1 "Blighted property," "blighted," or "blight" means any urbanized or developed property which: (A) Presents two or more of the following conditions: (i) Uninhabitable, unsafe, or abandoned structures; (ii) Inadequate provisions for ventilation, light, air, or sanitation; (iii) An imminent harm to life or other property caused by fire, flood, hurricane, tornado, earthquake, storm, or other natural catastrophe respecting which the Governor has declared a state of emergency under state law or has certified the need for disaster assistance under federal law; provided, however, this division shall not apply to property unless the relevant public agency has given notice in writing to the property owner regarding specific harm caused by the property and the owner has failed to take reasonable measures to remedy the harm; (iv) A site identified by the federal Environmental Protection Agency as a Superfund site pursuant to 42 U.S.C. Section 9601, et seq., or environmental contamination to an extent that requires remedial investigation or a feasibility study; (v) Repeated illegal activity on the individual property of which the property owner knew or should have known; or (vi) The maintenance of the property is below state, county, or municipal codes for at least one year after notice of the code violation; and (B) Is conducive to ill health, transmission of disease, infant mortality, or crime in the immediate proximity of the property.

Response

The Gwinnett County Construction Code does not use the term “blighted structure,” but does define “Unsafe Buildings” under Section 1.02.5. Gwinnett County will use this “Unsafe Buildings” definition from its Construction Code as its “blighted structure” definition for the NSP:

“102.5. Unsafe Buildings or Systems

All buildings, structures, or electrical, gas, mechanical, energy conservation and plumbing systems which are unsafe, unsanitary, or do not provide adequate egress, or which constitute a fire hazards, or are other dangerous to human life, or which in relation to existing use, constitute a hazard to safety or health, are consider unsafe buildings or service systems. All such unsafe buildings, structures, energy conservation or service systems are hereby declared illegal and shall be abated by repair and rehabilitation or by demolition in accordance with the provisions of the Gwinnett County Unfit Building Abatement Code found at 42-26 of the Gwinnett County Code or Ordinances.”

“Section 42-26 [Abatement] of the Gwinnett County Code of Ordinances:

Where it is determined that there exists in the county dwelling or other building or structure which is unfit for human habitation or for commercial industrial, or business occupancy or use, or where there exists in the county a condition or use of real estate which renders adjacent real estate unsafe or inimical to safe human habitation; and where such determination is made by the director of the department of planning and development or his designated enforcement official, such official shall have the power to have repaired, closed or demolished any such dwelling, building or structure, or cause to be abated if any such unsafe or unsanitary conditions which create a public health hazard or general nuisance in accordance with the provision of O.C.G.A. [Official Code of Georgia, Annotated] Sections 41-2-7 through 41-2-17, where are hereby adopted and incorporated by reference within this section. [Code 1978, Section 9-1009).”

“Official Code of Georgia Annotated, 41-2-7:

§ 41-2-7. Power of counties and municipalities to repair, close, or demolish unfit buildings or structures; health hazards on private property; properties affected

(a) It is found and declared that in the counties and municipalities of this state there is the existence or occupancy of dwellings or other buildings or structures which are unfit for human habitation or for commercial, industrial, or business occupancy or use and not in compliance with the applicable state minimum standard codes as adopted by ordinance or operation of law or any optional building, fire, life safety, or other codes relative to the safe use of real property and real property improvements adopted by ordinance in the jurisdiction where the property is located; or general nuisance law and which constitute a hazard to the health, safety, and welfare of the people of this state; and that a public necessity exists for the repair, closing, or demolition of such dwellings, buildings, or structures. It is found and declared that in the counties and municipalities of this state where there is in existence a condition or use of real estate which renders adjacent real estate unsafe or inimical to safe human habitation, such use is dangerous and injurious to the health, safety, and welfare of the people of this state and a public necessity exists for the repair of such condition or the cessation of such use which renders the adjacent real estate unsafe or inimical to safe human habitation. Whenever the governing authority of any county or municipality of this state finds that there exist in such county or municipality dwellings, buildings, or structures which are unfit for human habitation or for commercial, industrial, or business uses due to dilapidation and not in compliance with applicable codes; which have defects increasing the hazards of fire, accidents, or other calamities; which lack adequate ventilation, light, or sanitary facilities; or where other conditions exist rendering such dwellings, buildings, or structures unsafe or unsanitary, or dangerous or detrimental to the health, safety, or welfare, or otherwise inimical to the welfare of the residents of such county or municipality, or vacant, dilapidated dwellings, buildings, or structures in which drug crimes are being committed, power is conferred upon such county or municipality to exercise its police power to repair, close, or demolish the aforesaid dwellings, buildings, or structures in the manner provided in this Code section and Code Sections 41-2-8 through 41-2-17.

(b) All the provisions of this Code section and Code Sections 41-2-8 through 41-2-17 including method and procedure may also be applied to private property where there exists an endangerment to the public health or safety as a result of unsanitary or unsafe conditions to those persons residing or working in the vicinity. A finding by any governmental health department, health officer, or building inspector that such property is a health or safety hazard shall constitute prima-facie evidence that said property is in violation of this Code section and Code Sections 41-2-8 through 41-2-17.

(c) The exercise of the powers conferred upon counties in this Code section and in Code Sections 41-2-8 through 41-2-17 shall be limited to properties located in the unincorporated areas of such counties.”

(2) Definition of “affordable rents.” Applicants 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.

Note: The State will require the NSP program recipients to follow the HUD regulations as set forth in 24 CFR 92.252.

Response:

Affordable Rents Definition: Although Gwinnett County has no initial plans to use its NSP grant funds or NSP Program Income for rental properties, for the purposes of the NSP Program, Gwinnett

County defines Affordable Rents as the Fair Market Rents published annually by HUD for the Housing Choice Voucher Program [formerly known as the Section 8 Program].

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

Note: The State will require NSP projects to follow the affordability requirements for the HUD HOME program as set forth in 24 CFR 92.252 (2) (2) for rental housing and in 24 CFR 92.254 for homeownership housing, based on the amount of NSP funds provided for each project. All rental housing affordability restrictions will be imposed by deed restrictions. When there is more than one financing source (besides NSP) imposing land use restrictions on a project, the most restrictive requirements will apply to the project.

For homeownership projects, the DCA NSP program loan documents including a subordinate deed to secure debt, loan agreement and/or note will be used to enforce the required period of affordability.

In accordance with HERA, in the case of previously HOME-assisted properties for which affordability restrictions were terminated through foreclosure or deed in lieu of foreclosure, an NSP applicant will be required to reinstate the HOME affordability restrictions for the remaining period of HOME affordability or any more restrictive continuing period of affordability required by any other financing source participating in the NSP project.

Response:

Gwinnett County will ensure “continued affordability” of housing assisted with NSP funds by using the “Recapture Method” as defined in 24 CFR 92.254(5)(ii), by incorporating the use of Promissory Notes and Deeds to Secure Debt which contain recapture clauses and possibly the use of shared-equity loans. The use of these instruments will prohibit homebuyers from reaping windfall profits. NSP funds will be recaptured if NSP homebuyers sell the homes before the end of the period of affordability. The use of “shared equity” is also being considered for NSP. This process would also help reduce the incentive for homeowners to sell their homes during the affordability period, thereby keeping NSP assisted homes affordable during the entire period of affordability, and protecting the investment of NSP funds by Gwinnett County.

Acquire/Rehabilitate/Sell Foreclosed Vacant Single-Family Housing

Loans to Developers/Asset Management Entities

The County will make loans from the NSP grant and/or Program Income funds to developers/asset management entities which will purchase and rehabilitate foreclosed single-family housing located in Gwinnett County’s designated areas of greatest need. Promissory notes and deeds to secure debt will be used for these loans to developers/asset management entities to protect the affordability of the properties.

Loans to Homebuyers

Homebuyers who purchase homes which have been purchased/rehabilitated with NSP grant or Program Income funds from developers/asset management entities may receive “soft second” loans from the NSP Program or from HOME Program funds. The amount of the “soft second” for each

homebuyer will be determined by the loan underwriting process carried out by the Gwinnett County Community Development Program. The NSP homebuyer loans will be secured by promissory notes and deeds, which specify that the amount of the investment of NSP funds or HOME Program funds is secured by 0% loans to be repaid to Gwinnett County if the homes are sold during the 15 year loan term.

Gwinnett County may also make Downpayment Assistance loans to the NSP homebuyers from NSP grant or Program Income funds [homebuyers between 81%-120% AMI] or from HOME Program or ADDI funds [homebuyers at \leq 80% AMI]. The 0% Downpayment Assistance loans do not require repayment unless the homes are sold before the end of a five (5) year loan term. If the home is sold before the end of the five-year period, a pro-rated portion of the Downpayment Assistance funds are repaid to Gwinnett County.

Entitlement HOME Program funds will be used to provide “soft seconds” and Downpayment Assistance to homebuyer households with incomes at or below 80% AMI, while NSP funds will be used for these purposes for households with incomes between 80% and 120% AMI.

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

Note: At a MINIMUM, NSP rehabilitation activities must meet the following:

- a) Newly constructed or rehabilitation of single or multi-family residential structures being funded using NSP assistance must, at project completion, meet all applicable regulations in accordance with Minimum Standard Georgia Building Codes (<http://www.dca.state.ga.us/development/constructioncodes/programs/codes2.asp>) as well as all locally adopted codes
- b) All requirements of 24 CFR Part 35 as related to lead-based paint shall apply to NSP activities.
- c) All single and/or multifamily residential structures must also meet all federal and state accessibility requirements including but not limited to those associated with the use of federal funds.

Response:

Gwinnett County will use as its NSP Rehabilitation Standards its HOME Program Property Standards, which use the Georgia Uniform Code Act [ICC building Code, National Electrical Code, etc.], as implemented through the Gwinnett County Housing Rehabilitation Standards. No homes built before 1978 will be acquired and rehabilitated using NSP funds from DCA. All accessibility requirements will be addressed, as necessary.

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:

\$_____.

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. The response must describe the methodology their project will use to ensure that **at least** 25% of NSP funds will be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income

Response:

Gwinnett County will use 25% of its NSP Direct Allocation from DCA [at least \$751,056.75 (\$3004,227 @ 25%)] plus 25% of any program income received to purchase and rehabilitate abandoned or foreclosed upon single-unit homes or townhomes, which will house individuals or families whose incomes do not exceed 50 percent of area median income.

Two financial techniques will be used to help ensure that the 25% requirement is met:

1. **“Soft Second” mortgages** will reduce the payment required from a homebuyer at 50% AMI. This product does not require scheduled payments from the homebuyer during a 15-year term. However, if the homebuyer sells the property during the 15-year period, all or a portion of this debt must be repaid to Gwinnett County. “Soft second” mortgages will be funded from NSP funds or from HOME funds, as determined by the income of the homebuyers.
2. **Downpayment Assistance** will be provided to NSP homebuyers [\$7,500 per household]. For homebuyers who have income of 50% AMI and below, HOME Program and/or ADDI funds, or NSP funds may be used.

The use of “soft second” mortgages and downpayment assistance will be used by Gwinnett County to assist homebuyers at 50% AMI to afford to purchase NSP assisted properties.

E. ACQUISITIONS & RELOCATION

Indicate whether applicant intends to demolish or convert any low- and moderate-income dwelling units (i.e., ≤ 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., ≤ 120% of area median income—reasonably expected to be produced by activity and income level 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:

Gwinnett County expects to convert and demolish no (0) low- and moderate-income dwelling units (i.e., ≤ 80% of area median income).

Gwinnett County has a substantial number of vacant foreclosed single-family homes that are suitable for rehabilitation and sale to NSP-eligible homebuyers. Therefore, no conversion or demolition is included in this proposed use of NSP funds by Gwinnett County.

Affordable housing constructed to replace the demolished units will be:

Housing units expected to be made available to households \leq 120% of area median income. Not applicable – No demolitions.

Housing units expected to be made available to households \leq 80% of area median income. Not applicable – No demolitions.

Housing units made available to households \leq 50% of area median income. Not applicable – No demolitions.

F. PUBLIC COMMENT

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

Note: The applicant must agree to the following:

As required by the Housing and Community Development Act, the Georgia Department of Community Affairs has adopted a written Citizen Participation Plan, available on the DCA website at <http://www.dca.state.ga.us/communities/CDBG/programs/downloads/CDBGForms/CitizenParticipationPlan.pdf>

Applicants for and recipients of CDBG/NSP funds certify that they will follow this plan that requires that local units of government will provide for and encourage participation in the planning, implementation and assessment of their CDBG/NSP program.

In order to meet these goals, applicants must, at a minimum, meet the following requirements.

1. Hold at least one (1) public hearing in the locality prior to submission of an application to DCA. The purpose of the hearing will be to obtain citizens' views and input in the development of their Neighborhood Stabilization Program (NSP) application. The applicant must furnish information including the estimated amount of funds proposed to be used for each NSP activity.

Note: For joint or regional applications, separate public hearings for each jurisdiction are required. A single public hearing, however, may serve the needs of each jurisdiction, provided that (a) each jurisdiction shares a central location and (b) the hearing is clearly publicized to residents of all applicable jurisdictions. If a single hearing is proposed, please contact DCA for guidance.

2. Notification of the public hearing must be published not less than five (5) calendar days prior to the date of the hearing in the non-legal section of a local newspaper of general circulation or on the jurisdiction's web page.
3. Hearings must be held at times and locations convenient to potential or actual beneficiaries and with accommodations for the disabled. The needs of non-English speaking residents must be met for public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. Contact DCA for any required assistance.
4. Applicant files must contain documentary evidence that the actions listed herein have been taken, including copies of actual notices and minutes of hearings.

5. Citizens must be provided with reasonable and timely access to local meetings, information and records relating to the local government's proposed and actual use of CDBG/NSP funds as required by HUD regulations, state law, or DCA policy.
6. This section should not be construed to restrict the responsibility or authority of the local government for the development and execution of its community development program.
7. The applicant must certify in the Certified Assurances component of the application that the requirements above have been met.

Response:

- 1. Gwinnett County voted unanimously to approve the submission of an application to DCA for NSP funds – December 16, 2008.**
- 2. Gwinnett County Publishes Notice of Public Hearing and Public Comment Period in Gwinnett Daily Post – January 8, 2009 [see Attachment 1].**
- 3. Gwinnett County Public Hearing – January 13, 2009 – 6:00 P.M., Gwinnett Justice and Administration Center, Conference Room A, 75 Langley Drive, Lawrenceville, Georgia 30045-6900 [see Attachment 1].**
- 4. Public Comments Due – January 14, 2009 [See Attachment 1 comments received].**

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

(1) Activity Name: **Purchase/Rehabilitate Foreclosed Single-Family Housing**

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

NSP Eligible Use:

Purchase and Rehabilitation

Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties. [HERA, Sec 2301(c)(3)(B)] – NSP Type B

CDBG Eligible Use

Acquisition [24 CFR 570.201]

Disposition [24 CFR 570.201]

Rehabilitation [24 CFR 570.202]

Direct Homeownership Assistance [24 CFR 570.201]

Activity delivery costs for eligible activities defined in 24 CFR 570.206.

(3) National Objective: (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).

All NSP funds will be directed to: Benefit to low-, moderate-, middle income i.e., ≤ 120% of area median income).

(4) 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.

Response

The Gwinnett County designated “areas of greatest need” [see Table 1, Page 3, and Map 1, Page 11] represent the Census Tracts with the high number of foreclosures, with the highest numbers of subprime loans, and which have the greatest risk of foreclosure and abandonment.

All homes assisted with NSP funds or NSP Program Income will be offered for sale to NSP-eligible households at affordable purchase prices with affordable fixed rate primary mortgages, with potential NSP financed “soft second” loans, and with Downpayment Assistance provided from grant or Program Income funds from NSP, or from the HOME Program, or from the American Dream Downpayment Initiative [as determined by the household incomes of the homebuyers].

Through its grants management and oversight processes, Gwinnett County will ensure that at least 25% of the NSP funds expended will provide homeownership opportunities to homebuyers with incomes ≤50% AMI.

This activity will provide homeownership for the number of families identified in Item “6. Performance Measures.”

(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

Gwinnett County will focus the activity in Census Tracts which were identified by HUD as possessing a high risk for foreclosure or abandonment, as supplemented by areas which actual foreclosures have occurred in significant numbers. [See Page 1, Item A, and Table 1, Page 3, and Map 1-3, Page 11.]

(6) 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):

Proposed Budget/Performance Measures:

[Note: All Homes are Vacant Foreclosed Single-Family [Detached or Townhomes]

NSP Grant Funds

Total NSP grant funding available from/requested from DCA:	\$3,004,227.00	
Total Project Funds [NSP Grant Funds]	\$2,823,973.30 [94%]	
Total Program Administration Funds [NSP Grant Funds]	\$ 180,253.70 [6%]	
Total NSP grant funds requested from DCA:	\$3,004,227.00 [100%]	
NSP Grant Funds – 25% for Homebuyers @ 50% AMI	\$751,056.75	
Total Proposed Numbers of Homes - Purchase/Rehabilitate/Sell to households not to exceed 120% Area Median Income		11
Total Proposed Numbers of Homes - Purchase/Rehabilitate/Sell to households not to exceed 50% of Area Median Income		<u>6</u>
Total Proposed Number of Homes Assisted with NSP Grant Funds		17

NSP Estimated Program Income

Total Estimated Program Income [from loan repayments] [Derived from \$100,000 repayment on 11 loans]	<u>\$1,100,000.00</u>	
Total Project Funds [NSP Estimated Program Income]	\$1,034,000.00 [94%]	
Total Program Administration Funds [NSP Program Income]	\$ 66,000.00 [6%]	
Total NSP grant funds requested from DCA:	\$1,100,000.00 [100%]	
Total Proposed Numbers of Homes - Purchase/Rehabilitate/Sell to households not to exceed 120% Area Median Income		5
Total Proposed Numbers of Homes - Purchase/Rehabilitate/Sell to households not to exceed 50% of Area Median Income		<u>2</u>
Total Proposed Number of Homes Assisted with Estimated Program Income		7
NSP Estimated Program Income – 25% for Homebuyers @ 50% AMI	\$275,0000.00	

Total NSP Grant Funds and Estimated Program Income

Total proposed expenditures [NSP Grant & Estimated Program Income]	\$4,104,227.00	
Total Proposed Numbers of Homes - Purchase/Rehabilitate/Sell to households not to exceed 120% Area Median Income		16
Total Proposed Numbers of Homes - Purchase/Rehabilitate/Sell to households not to exceed 50% of Area Median Income		<u>8</u>
Total Proposed Number of Homes		24

Note: HOME Program/ADDI funds [\$337,500] will provide “soft second” mortgages and downpayment assistance for homebuyers whose incomes are 80% and below AMI.

Program Adm. Costs [6% of NSP Grant – 5 Year Budget]	\$ 180,253.70
Program Adm. Costs [6% of Est. Program Income– 5 Year Budget]	\$ <u>66,000.00</u>
Total Activity Administration Budget [5 Year Budget]	\$ 246,253.70

(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

Gwinnett County Community Development Program
 [Under Supervision of the Gwinnett County Department of Financial Services]
 575 Old Norcross Road, Suite A
 Lawrenceville, GA 30045-4367

Director: Craig Goebel
 Telephone: (770) 822-5190
 FAX: (770) 822-5193
 Email: craig.goebel@gwinnettcountry.com

NSP Program Manager: G. William “Bill” Kingsbury
 Telephone: (770) 822-5424
 FAX: (770) 822-5195
 Email: william.kingsbury@gwinnettcountry.com

(9) Projected Start Date: March 1, 2009

(10) Projected End Date: March 31, 2014

(11) Specific Activity Requirements

1. For acquisition activities, include:
 - discount rate

Response: Minimum 15% on the purchase of any and all individual foreclosed single-family homes or fee-simple townhomes.

2. For financing activities, include:
 - range of interest rates

Response: NSP or HOME Program “soft second” loans and Downpayment Assistance to homebuyers will be made at 0% interest.

3. For housing related activities, include:

- a. duration or term of assistance;

Response: “Soft-second” mortgages =15 year term/0% interest

- b. tenure of beneficiaries--rental or homeownership;

Response: homeownership, only, no rental

- c. a description of how the design of the activity will ensure continued affordability.

Response: “Soft-second” mortgages will be secured by Promissory Notes and Deeds to Secure Debt which will require repayment of the NSP grant or Program Income funds/HOME Program grant or Program Income funds if the properties are sold or ownership transferred during the loan term.

H. Complete a budget summary for each activity including source(s) of funds and use(s) for each activity proposed in Section G. See the guidance below for the preparation of *DCA NSP Form H*.

The purpose of this form is to allow applicants to describe, in detail, the resources available, or to be made available, for each activity. Applicants are encouraged to provide sufficient quantifiable data and to describe supporting efforts for the proposed program. Form DCA NSP Form H should be backed-up by credible estimates of program cost prepared by individuals and agencies qualified to provide them.

Leverage may be cash or in-kind services. Its source may be local public funds, other state or federal funds, or private investments or contributions. Whatever the source, it must be evidenced by a firm written commitment in order to demonstrate a proposed program’s readiness to proceed.

◆ **Line item instructions**

- ✓ In **column 1**, list the NSP eligible use using the uses found in the HERA statute at Title III, 2301(c) and at the federal register at FR-5255-N-01. Rather than stating each use in its entirety, please use the appropriate letter found in the law and the federal register. For example, use the letter (D) to indicate the use as “Demolish Blighted Structures.”
- ✓ In **column 2**, list the activity name and number. See the note on the activity numbering system below.
- ✓ In **column 3**, briefly itemize NSP funds allocated for each activity. These brief summaries can reference additional detail that may be included in reports and attached to the application. The purpose of this form is to allow a review panel to compare unit costs. Be sure to provide units and costs (i.e., "construct 5,000 SF health center @ \$75 SF -- total cost: \$375,000).

Total engineering and architectural costs must be itemized here and shown in columns 3 through 6.

Housing applications including rehabilitation activities for units constructed prior to 1978 should budget an additional 25% of the total estimated rehabilitation cost to fund compliance with lead-based paint regulations.

- Sufficient detail should be provided in this column to support proposed engineering and inspection fees. Such data should include detail on proposed services, as well as estimated fees for design services, conferences, travel, resident and periodic inspections, tests, surveys, printing and reproduction, additional services, etc.
- ✓ In **column 4** reference the NSP cost, if any, for each item shown in column 2. If the item in column 2 will not be paid for with NSP funds, indicate by placing a -0- in column 4.
 - ✓ In **column 5** show the amount of "other funds" (not NSP) that will be used to pay for itemized costs. The source of these funds should be identified on **column 6**.
 - ✓ In **column 7**, enter the total amount of funds available to carry out the proposed activity. On each page of *DCA NSP Form H* use **block 8** to subtotal columns 3, 4 and 5. On the final page, use **block 9** to total all pages.
 - ✓ Attach clear commitments from the appropriate agencies.

◆ **Note on Activity Numbering System**

The activity number is used in this application on the *DCA NSP Form H*. In all instances, the activity should be referred to both by the activity number and activity name, as explained further below. In addition, all activities must be eligible as listed in the federal register at FR-5255-N-01.

The activity number system has two components:

- The prefixes indicate the purpose of the activity as follows:
 - A = Administration
 - E = Economic Development
 - H = Housing
 - P = Public Facility
 - T = Engineering
 - S = Architecture
- The second component is the budget code. The codes can be found below. Every code is comprised of three (3) alpha or numeric characters followed by a hyphen and then two (2) additional numeric characters. This code indicates the type of activity.

For example:

- P-001-00 = Acquisition of Property for a Public Facility
- H-001-00 = Acquisition of Property for Housing
- A-21A-00 = Grant Administration

001-00 Acquisition of Property (all acquisitions)
 002-00 Disposition of Property
 003-00 Public Facilities and Improvements (other)
 003-01 Domestic Violence Shelter
 003-02 Group Home
 003-03 Learning Center
 03A-00 Senior Centers
 03B-00 Centers for the Disabled/Handicapped
 03C-00 Homeless Facilities (not operating costs)
 03D-01 Boys and Girls Club or other At Risk Facility
 03D-02 Youth Shelter
 03E-00 Neighborhood Facilities
 03G-00 Parking Facilities
 03M-01 Child Care Center
 03M-02 Head Start Center
 03P-01 Health Center - Mental
 03P-02 Health Center – Physical
 03P-03 Health Center - Mental and Physical
 03Q-00 Abused and Neglected Children's Facilities
 03F-00 Parks, Playgrounds and other Rec. Facilities
 003-04 Public Utilities, other than Water & Sewer Fac.

Budget Codes

03K-01 Street Improvements
 03J-01 Water Facilities
 03J-02 Sewer Facilities
 03L-00 Pedestrian Walkways
 03K-02 Flood and Drainage Facilities
 03S-00 Facilities for AIDS Patients (not operating)
 004-00 Clearance
 005-01 Public Services (General)
 008-00 Relocation Payments and Assistance
 009-00 Payments for Loss of Rental Income
 14C-00 Rehabilitation of Public Residential Structures
 14A-01 Rehabilitation of Private Properties
 015-00 Code Enforcement
 14A-02 Reconstruction of Private Properties
 003-05 Site Development
 012-00 Housing – Construction
 005-02 Homebuyer Education
 013-00 Down payment/Closing Cost Assistance
 X00-00 Other - General (Attach Description)
 020-00 Planning
 21A-00 Administration (General)

**Georgia Department of Community Affairs
NSP Program
Budget Analysis**

Applicant: Gwinnett County, Georgia

Original: Amendment dated: _____

1 NSP Eligible Use	2 Activity Name/Number	3 Itemized Unit Costs	4 NSP Funds	5 Other Funds	6 Source of Other Funds	7 Total Cost
(A)	Downpayment Assistance (H-013-00)	2 Homebuyers Assisted at \$7,500 each 15 Homebuyers Assisted at \$7,500 each	\$15,000	\$112,500*	HOME/ADDI Programs	\$127,500
(A)	“Soft Second” Mortgages (H-X00-00)	2 Homebuyers Assisted at \$15,000 each 15 Homebuyers Assisted at \$15,000 each	\$30,000	\$225,000*	HOME/ADDI Programs	\$255,000
(B)	Acquisition (H-001-00)	Purchase 24 Residential Foreclosed Homes for an average cost between \$133,000 and \$138,000	\$2,353,973	\$859,000	Estimated Program Income	\$3,212,973
(B)	Rehabilitation (H-14A-01)	Rehab. 24 Residential Units for \$25,000 each	\$425,000	\$175,000	Estimated Program Income	\$600,000
	Administration (H-21A-00)		\$180,254	\$66,000	Estimated Program Income	\$246,254
8 Subtotal		-	<u>\$3,004,227</u>	<u>\$1,437,500</u>		<u>\$4,441,727</u>
9 Grand Total (if final page)		-	<u>\$3,004,227</u>	<u>\$1,437,500</u>		<u>\$4,441,727</u>

Check here if continued on additional pages: _____

Page 1 of 1

DCA NSP Form H

*Note: Downpayment Assistance and “Soft Second” Mortgages are to be provided from Gwinnett County Entitlement HOME Program funds for homebuyers whose income is 80% AMI and less. Homebuyers between 80% and 120% AMI will receive NSP loans for these purposes.

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 (for HUD Entitlement jurisdictions) or the State of Georgia (for non-entitlement communities).

(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 NEPA.** The jurisdiction will comply with the National Environmental Policies Act of 1969 (NEPA) and HUD regulations implementing NEPA titled "Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities" (24 CFR Part 58).

(16) **Compliance with laws.** The jurisdiction will comply with applicable laws and regulations.



Signature/Authorized Official
[Maria Woods]

1-14-09
Date

Acting Director, Gwinnett County Department of Financial Services
Title

APPROVED AS TO FORM:

DEPUTY COUNTY ATTORNEY

Resources

The following are resources that may be helpful in development of your NSP Action Plan:

1. DCA: <http://www.dca.state.ga.us/>

Questions regarding action plan: nsp.questions@dca.ga.gov
2. HUD: <http://www.hud.gov/nsp>
3. Dataplace: <http://www.dataplace.org>
4. ICF Consulting: ICF set up a special NSP Web site to highlight current thinking, useful tools, and relevant background materials related to the NSP:
<http://www.icfi.com/nsp>
5. Home Depot: <http://www.homedepot.com/gov>
6. HousingPolicy.org: Resources on preventing foreclosures & stabilizing communities -- www.housingpolicy.org/foreclosure-response.html
<<http://app.bronto.com/public/?q=ulink&fn=Link&ssid=619&id=bh3ohfqr53cr7farpz3dhib1zxlz&id2=k1nbz4ed58g09mov22wzb95yq81dd>
7. PEMCO, Ltd., the M & M contractor for HUD in Georgia. This website contains important information regarding the purchase of HUD homes in Georgia and maintains a database to search available properties.
<http://www.hudpemco.com>
8. The following website allows you to locate revitalization areas. You can search by city, county, zip code or property address.
<http://www.hud.gov/offices/hsg/sfh/revite/abtrevt.cfm>
9. This link provides a list of HUD-approved housing counseling agencies located in the state of Georgia:
<http://www.hud.gov/offices/hsg/sfh/hcc/hcs.cfm?webListAction=search&searchstate=GA>
10. This link outlines the steps for becoming a HUD-approved housing counseling agency:
<http://www.hud.gov/offices/hsg/sfh/hcc/hccprof13.cfm>

Attachment 1

Gwinnett County Application
Requesting
Neighborhood Stabilization Program
Direct Allocation Pool Funds
From
Georgia Department of Community Affairs
January 15, 2009

AGENDA
PUBLIC HEARING
FOR THE
GWINNETT COUNTY COMMUNITY DEVELOPMENT PROGRAM

PROPOSED NEIGHBORHOOD STABILIZATION PROGRAM APPLICATION

TO

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

**GWINNETT JUSTICE AND ADMINISTRATION CENTER
CONFERENCE CENTER, ROOM A
75 LANGLEY DRIVE
LAWRENCEVILLE, GA 30045-6900**

JANUARY 13, 2009

6:00 P. M.

- I. Welcome and Introductions**
- II. Purpose of the Public Hearing**
- III. Description of Forms/Handouts and Instructions for Written Comments**
- IV. Public Comments**
- V. Adjournment**

Gwinnett County Neighborhood Stabilization Program

575 Old Norcross Road, Suite C

Lawrenceville, Georgia 30045-4367

(770) 822-5424 Fax (770) 822-5195 email: gchcd@gwinnettcountry.com

Administered by W. Frank Newton, Inc.

Program Management Firm for Gwinnett County

An Equal Opportunity Employer

Frank Newton, President



Minutes
Public Hearing
Proposed Application
To
Georgia Department of Community Affairs
Requesting
Neighborhood Stabilization Program [NSP]
Direct Allocation Pool Funds

January 13, 2009
6:00 P.M.
Gwinnett Justice and Administration Center [GJAC]
Conference Center, Room A
75 Langley Drive
Lawrenceville, Georgia 30045-6900

Attending:

Craig Goebel, Director, Gwinnett County Community Development Program
Bill Megaro, Housing Programs Coordinator, Gwinnett County Community Development Program
Bill Kingsbury, Program Manager, Gwinnett County Neighborhood Stabilization Program

The Public Hearing was convened by Craig Goebel at 6:00 P.M.

No citizens were in attendance and the Public Hearing was adjourned at 6:30 P.M.

Additional Public Comments Received during the Public Comment Period:

None.

Attachment 2

Gwinnett County Application
Requesting
Neighborhood Stabilization Program
Direct Allocation Pool Funds
From
Georgia Department of Community Affairs
January 15, 2009

Loan Commitment Letter

Gwinnett County

Department of Financial Services
Budget Division



75 Langley Drive • Lawrenceville, GA 30045-6900
(tel) 770.822.7822 • (fax) 770.822.7818

gwinnettcounty

January 14, 2009

Mr. Brian Williamson
Assistant Commissioner
Georgia Department of Community Affairs
60 Executive Park South, NE
Atlanta, Georgia 30329-2231

Re: Commitment of Loan Funds

Attention: Mr. Glenn Misner

Dear Mr. Williamson:

The Gwinnett County Department of Financial Services, Community Development Program, administers the HUD grant programs for the Gwinnett County Department of Financial Services, including the Entitlement Community Development Block Grant Program, HOME Program, American Dream Downpayment Initiative, and Emergency Shelter Grants Program. The new Neighborhood Stabilization Program is now the responsibility of our agency.

The application to DCA for NSP funds includes the proposed use of NSP grant funds and estimated program income to acquire/rehabilitate and sell vacant foreclosed single-family housing to NSP-eligible homebuyers. A portion of the cost of NSP-assisted housing units will be the use of NSP funds for "soft second" mortgages and for downpayment assistance. This letter represents a commitment of NSP funds for these purposes.

Homebuyers of NSP-assisted homes with incomes up to 80% AMI will receive "soft second" mortgage and downpayment assistance from Gwinnett County Entitlement HOME Program funds and will receive Downpayment Assistance from Gwinnett County Entitlement HOME Program or American Dream Downpayment Initiative [ADDI] funds. This letter represents a commitment of HOME Program or ADDI funds for these purposes for NSP homebuyers.

Individual homebuyers must qualify for first mortgages to purchase vacant foreclosed single-family housing. Each loan to individual homebuyer households will be obtained as the homes are sold. It is anticipated that most of the purchases will be financed with FHA mortgages obtained through numerous lenders. Therefore, it is not possible to include commitment letters with this application, at this time, from all of the potential mortgage lenders.

Sincerely,

Maria Woods

Maria Woods
Acting Director of Financial Services

APPROVED AS TO FORM:
Melinda K. Nelb
DEPUTY COUNTY ATTORNEY

cc: Mr. Craig Goebel, Director, Gwinnett County Community Development Program

Attachment 3

Gwinnett County Application
Requesting
Neighborhood Stabilization Program
Direct Allocation Pool Funds
From
Georgia Department of Community Affairs
January 15, 2009

Request for Reallocated NSP Funds Letter

gwinnettcounty

Department of Financial Services
Budget Division

75 Langley Drive • Lawrenceville, GA 30045-6900
(tel) 770.822.7822 • (fax) 770.822.7818



January 14, 2009

Mr. Brian Williamson
Assistant Commissioner
Georgia Department of Community Affairs
60 Executive Park South, N.E.
Atlanta, Georgia 30329-2231

Re: Request for Reallocated NSP Funds

Attention: Mr. Glenn Misner

Dear Mr. Williamson:

Gwinnett County submits, via this letter, a request for any reallocated Neighborhood Stabilization Program [NSP] funds.

Any reallocated NSP funds awarded by DCA to Gwinnett County will be used to acquire/rehabilitate vacant foreclosed single-family housing for sale to NSP-eligible homebuyers. Gwinnett County will comply with all NSP requirements, including the expenditure of 25% of NSP funds received to benefit by Georgia DCA to benefit households with income which is not greater than 50% of Area Median Income for Gwinnett County.

Please refer to Gwinnett County's Application for Reservation of Funds [NSP Direct Allocation Pool], for details on how Gwinnett County will carry out its DCA-funded NSP activities.

If you have questions regarding this request for reallocated NSP funds, please contact Craig Goebel at the Gwinnett County Community Development Program 770-822-5190 or craig.goebel@gwinnettcounty.com.

Sincerely,

A handwritten signature in blue ink that reads "Maria Woods".

Maria Woods
Acting Director
Gwinnett County Department of Financial Services

cc: Craig Goebel, Director, Gwinnett County Community Development Program

APPROVED AS TO FORM:
A handwritten signature in blue ink that reads "Melinda K. Stells".
DEPUTY COUNTY ATTORNEY

Attachment 4

Gwinnett County Application
Requesting
Neighborhood Stabilization Program
Direct Allocation Pool Funds
From
Georgia Department of Community Affairs
January 15, 2009

SF-424 Form - Signed

Application for Federal Assistance SF-424		Version 02
*1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
*2. Type of Application * If Revision, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
*Other (Specify) _____		
3. Date Received:		4. Applicant Identifier: NSP -2008
5a. Federal Entity Identifier: UOG # 139135		*5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
*a. Legal Name: Gwinnett County, Georgia		
*b. Employer/Taxpayer Identification Number (EIN/TIN): 58-600083		*c. Organizational DUNS: 05-727-2734
d. Address:		
*Street 1: <u>Gwinnett Justice and Administration Center</u> Street 2: <u>75 Langley Drive</u> *City: <u>Lawrenceville</u> County: <u>Gwinnett</u> *State: <u>GA</u> Province: <u>N/A</u> *Country: <u>USA</u> *Zip / Postal Code: <u>30045-6900</u>		
e. Organizational Unit:		
Department Name: Gwinnett County Board of Commissioners		Division Name: Gwinnett County Department of Financial Services
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <u>Ms.</u> *First Name: <u>Tanikia</u>		
Middle Name: <u>S.</u>		
*Last Name: <u>Jackson</u>		
Suffix: _____		
Title: <u>Grants Manager</u>		
Organizational Affiliation: Gwinnett County Department of Financial Services		
*Telephone Number: 770-822-7863		Fax Number: 770-822-7887
*Email: <u>tanikia.jackson@gwinnettcountry.com</u>		

Application for Federal Assistance SF-424	Version 02
<p>*9. Type of Applicant 1: Select Applicant Type: B.County Government</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p>Type of Applicant 3: Select Applicant Type:</p> <p>*Other (Specify)</p>	
<p>*10 Name of Federal Agency: U.S. Department of Housing and Urban Development - Through Georgia Department of Community Affairs</p>	
<p>11. Catalog of Federal Domestic Assistance Number: 14-218 _____</p> <p>CFDA Title: Community Development Block Grant Program - Neighborhood Stabilization Program _____</p>	
<p>*12 Funding Opportunity Number: N/A _____</p> <p>*Title: N/A _____</p>	
<p>13. Competition Identification Number: N/A _____</p> <p>Title: N/A _____</p>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.): Gwinnett County and all Participating Cities</p>	
<p>*15. Descriptive Title of Applicant's Project: Gwinnett County Neighborhood Stabilization Program -DCA Direct Allocation Pool Application - Board of Commissioners Approval Date: December 16, 2008</p>	

Application for Federal Assistance SF-424		Version 02
16. Congressional Districts Of:		
*a. Applicant: 4 & 7	*b. Program/Project: 4 & 7	
17. Proposed Project:		
*a. Start Date: 3-1-2009	*b. End Date: 12-31-2012	
18. Estimated Funding (\$):		
*a. Federal	_____	\$3,004,227
*b. Applicant	_____	
*c. State	_____	
*d. Local	_____	
*e. Other	_____	
*f. Program Income	_____	\$1,100,000
*g. TOTAL	_____	\$4,104,227
*19. Is Application Subject to Review By State Under Executive Order 12372 Process?		
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on _____		
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.		
<input checked="" type="checkbox"/> c. Program is not covered by E. O. 12372		
*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)		
<input checked="" type="checkbox"/> ** I AGREE		
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions		
Authorized Representative:		
Prefix: Ms.	_____	*First Name: Maria _____
Middle Name:	_____	
*Last Name: Woods	_____	
Suffix:	_____	
*Title: Acting Director, Gwinnett County Department of Financial Services		
*Telephone Number: 770-822-7197	Fax Number: 770-822-7818	
* Email: maria.woods@gwinnettcountry.com		
*Signature of Authorized Representative: <i>Maria Woods</i>	*Date Signed: 1/14/2009	

Authorized for Local Reproduction

Standard Form 424 (Revised 10/2005)

APPROVED BY: *Melinda K. Wells*
DEPUTY COUNTY ATTORNEY

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.
Gwinnett County has no delinquent Federal debt.

Attachment 5

Gwinnett County Application
Requesting
Neighborhood Stabilization Program
Direct Allocation Pool Funds
From
Georgia Department of Community Affairs
January 15, 2009

Authorization from Gwinnett County Board of Commissioners

Gwinnett County Board of Commissioners Agenda Request

GCID #	Group With GCID #	<input checked="" type="checkbox"/> Grants <input type="checkbox"/> Contracts <input type="checkbox"/> Rezoning <input type="checkbox"/> Public Hearing				
20082789						
Department:	Financial Services			Date Submitted:	11/21/2008	
Working Session:	12/16/2008	Business Session:	12/16/2008	Public Hearing:		
Submitted By:	Tanikia Jackson			Multiple Depts?	No	
Budget Type:	Neither			Special Routing:		
Agenda Type	Approval/authorization		Rezoning Type			
Item of Business:					Locked by Purchasing	No
<p>to apply for and accept the Neighborhood Stabilization Program (NSP) grant from the Georgia Department of Community Affairs. Award amount is \$3,004,227 with no matching County Funds required. Approval and Authorization to implement the program as specified on the attached Action List; and for the Chairman or designee to sign all necessary grant documents subject to approval by the Law Department.</p>						
Attachments	Action List, Justification Letter					
Authorization: Chairman's Signature?	No					
Staff Recommendation	Approval					
Department Head	mbwoods (11/25/2008)					
Attorney	mkwells (12/4/2008)					
Attorney's Comments						
Agenda Purpose Only	<input checked="" type="checkbox"/>	As To Form	<input type="checkbox"/>	Hold for Pickup?	<input type="checkbox"/>	

Financial Services Use Only

Financial Action Requested					
	Budgeted	Fund Name	Current Balance	Requested Allocation	Director's Initials
	No	Grants	*	*	mbwoods (12/3/2008)
Finance Comments	* A budget will be established upon approval of this agenda item. No County matching are required.				

County Clerk Use Only

Working Session	Consent	Motion	Kenerly	PH was Held?	<input type="checkbox"/>
Action	Approved	2nd by	Beaudreau		
Tabled		Vote	4-0 (Green Absent)		

**ACTION REQUESTED FOR THE
NSP PROGRAM THROUGH DCA FOR
APPROVAL BY THE BOARD OF COMMISSIONERS
DECEMBER 16, 2008
20082789**

1. Authorization for Chairman to sign all necessary grant documents for grant application, acceptance, and project implementation. Authorization for Chairman to appoint and designate the Director of Financial Services (or his/her designee) to sign all necessary grant documents (including applications, reports, agreements, security deed modifications, memorandums of understanding, contracts, amendments with any municipality, non-profit agency, County agencies, and financial institutions, etc.) for project implementation, subject to Law Department review.
2. Authorization for Chairman to appoint and designate the Director of the Department of Financial Services (or his/her designee) to approve, execute and submit program amendments throughout the grant period and to serve as the "Official Representative" of Gwinnett County with the NSP through the Georgia Department of Community Affairs (DCA).
3. Authorization for Chairman to appoint and designate the Director of the Department of Financial Services (or his/her designee) to approve and execute changes in uses of NSP programs, change in scope of projects, and changes to site locations with no change to the project intent as approved by the Board. Changes in project use or location, with no change in amount or intent, will be handled within the Budget Resolution.
4. Authorization for Chairman to designate the Director of the Department of Financial Services (or designee) to execute the 2009-2010 housing inspector contract(s) for the housing rehabilitation program. This contractor will also perform required inspections for the Neighborhood Stabilization Program.
5. Approval of the administration and project budgets, and authorization for the Department of Financial Services to load and administer the budgets as approved.
6. Authorization to accept additional FFY 2008 funding if awarded by DCA with funds to be used within scope of the proposed plan.

Gwinnett County Board of Commissioners
Tuesday, December 16, 2008 - 2:00 P. M.
Business Session - Minutes
Page 7

VI. Consent Agenda

A. New Business

5. Financial Services/Maria Woods

2008-2819 Approval of vendor administration services for the Risk Management program, (January 01, 2009 through December 31, 2009), Department of Financial Services, per attached, base amount \$690,000.00. (Staff Recommendation: Approval) {Action: Approved Motion: Kenerly Second: Beaudreau Vote: 4-0 (Green Absent)}

2008-2789 Approval/authorization to apply for and accept the Neighborhood Stabilization Program (NSP) grant from the Georgia Department of Community Affairs. Award amount is \$3,004,227 with no matching County Funds required. Approval and Authorization to implement the program as specified on the attached Action List; and for the Chairman or designee to sign all necessary grant documents subject to approval by the Law Department. (Staff Recommendation: Approval) {Action: Approved Motion: Kenerly Second: Beaudreau Vote: 4-0 (Green Absent)}

6. Fire Services/Steve Rolader

2008-2804 Award RP030-08, purchase of midmount aerial platform fire trucks and accessories on an annual contract, (December 18, 2008 through December 17, 2009), Department of Fire and Emergency Services, to the highest scoring firm, Sutphen Corporation, base amount \$3,429,407.82. (Staff Recommendation: Award) {Action: Approved Motion: Kenerly Second: Beaudreau Vote: 4-0 (Green Absent)}

2008-2821 Award BLI29-08, purchase of rescue equipment and tools, Department of Fire and Emergency Services, to overall low responsive bidder, Municipal Emergency Services, \$214,292.00. (Staff Recommendation: Award) {Action: Approved Motion: Kenerly Second: Beaudreau Vote: 4-0 (Green Absent)}

Attachment 6

Gwinnett County Application
Requesting
Neighborhood Stabilization Program
Direct Allocation Pool Funds
From
Georgia Department of Community Affairs
January 15, 2009

Entitlement NSP Substantial Amendment Submitted to HUD

GWINNETT COUNTY, GEORGIA
NSP GRANT SUBMISSION TEMPLATE
& CHECKLIST
(UPDATED BY HUD 10.21.08)

GWINNETT COUNTY REVISION 2 – 12/30/08
[SEE PAGES 3, 13-15, 32-35]

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](#).

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

THE NSP SUBSTANTIAL AMENDMENT

Jurisdiction(s): <u>Gwinnett County, GA</u> (<i>identify lead entity in case of joint agreements</i>) Community Development Program [Department of Financial Services] Jurisdiction Web Address: www.gwinnettcounty.com (<i>URL where NSP Substantial Amendment materials are posted</i>)	NSP Contact Person: <u>Craig Goebel, Director</u> Address: <u>Gwinnett County Comm. Dev. Program</u> <u>575 Old Norcross Road, Suite A</u> <u>Lawrenceville, GA 30045-4367</u> Telephone: <u>(770) 822-5190</u> Fax: <u>(770) 822-5193</u> Email: craig.goebel@gwinnettcounty.com
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

NSP Grant Amount Requested From HUD

\$10,507,827

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:

Areas of Greatest Need in Gwinnett County

Gwinnett County is using, initially, the HUD-provided foreclosure and abandonment risk score to identify the areas within Gwinnett County which are its "areas of greatest need." The risk scores were ranked by HUD from 1-10, with 1 being the areas with the lowest foreclosure and abandonment risk and with 10 being the areas with the highest foreclosure and abandonment risk.

Gwinnett County has determined that all Census Tracts with foreclosure and abandonment risk scores of 5 and higher are included as "areas of greatest need." These Census Tracts are presented in the Table 1, Page 4, and are depicted graphically on Map 1, Page 12.

After the end of October 2008, the Gwinnett County Tax Commissioner's Office will also be providing land parcel specific data where foreclosures have occurred between November 2007 and October 2008. These data will also be mapped and correlated with the Census Tracts already identified as areas of greatest need using the HUD supplied foreclosure and abandonment risk

data. Adjustments will be made to the “areas of greatest need,” if necessary, after the comparison of these two sets of data.

[Revision 12/30/08, in response to HUD review comments sent 12/24/08 and 12/29/08]

Initially, Gwinnett County planned to use information obtained from Tax Commissioner records to identify/locate residential foreclosures. However, recent investigations have determined that data sources such as FMLS, Realtytrac, FHA, and Fannie Mae provide more complete and more current data. The information obtained from the Tax Commissioner’s staff was interesting but somewhat limiting as it only reflected foreclosure filings, but information from the Georgia Department of Community Affairs and from commercial sources such as FMLS, Realtytrac.com, and the Mortgage Bankers Association will be used to help supplement the foreclosure risk areas identified by HUD, thereby documenting the actual incidences of foreclosures as well the concentrations of sub-prime mortgage loans. Local tax data will be used to supplement these types of information. Inventories of foreclosed residential properties will be overlain onto the areas with sub-prime mortgage concentrations to magnify the impact of moving these foreclosed vacant properties back into homeownership.

Gwinnett County is eligible to receive NSP funds directly from HUD and from the Georgia Department of Community Affairs. The County will work with DCA and other sources, such as the Mortgage Bankers’ Association and from other public and private data sources, to obtain additional information on the geographic distribution of sub-prime mortgage loans.

Gwinnett County will use NSP funds to acquire/rehabilitate foreclosed residential properties in the areas where sub-prime mortgage loans have been concentrated. The investment of NSP funds in areas with high concentrations of sub-prime loans will be combined with affordable fixed rate private mortgages which are determined not be sub-prime financial instruments.

Homebuyers and homeowners who live in areas with high concentrations of sub-prime mortgages will be encouraged to take advantage of housing counseling services made available to residents of the County and which help these homeowners understand the mortgage financing process.

TABLE 1

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050709	3	9
050709	4	9
050709	3	9
050709	4	9
050422	5	9
050422	5	9
050422	6	9
050716	1	9
050716	2	9
050716	3	9
050717	2	9
050717	1	9
050717	1	9
050717	2	9
050717	3	9
050105	2	9
050105	1	9
050105	2	9
050105	4	9
050105	2	9
050105	1	9
050105	4	9
050105	2	9
050105	1	9
050105	2	9
050522	6	9
050522	8	9
050417	1	9
050417	2	9
050522	8	9
050421	1	9
050421	1	9
050421	3	9
050416	1	8
050416	1	8
050416	3	8
050416	6	8

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050518	3	8
050518	4	8
050518	6	8
050721	6	8
050721	7	8
050721	8	8
050721	6	8
050721	7	8
050721	8	8
050424	1	8
050424	2	8
050704	1	8
050704	1	8
050704	1	8
050704	3	8
050704	1	8
050704	2	8
050704	4	8
050704	1	8
050704	2	8
050704	3	8
050704	4	8
050418	1	8
050418	2	8
050507	3	8
050507	7	8
050719	4	8
050719	5	8
050719	4	8
050719	5	8
050515	2	8
050515	3	8
050515	4	8
050519	4	8
050519	5	8
050519	7	8
050520	1	8
050520	2	8
050520	2	8

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050507	2	8
050507	3	8
050507	7	8
050411	3	8
050411	4	8
050411	5	8
050411	6	8
050411	1	8
050411	3	8
050411	4	8
050411	6	8
050423	1	8
050423	3	8
050423	4	8
050312	1	8
050312	3	8
050312	4	8
050312	6	8
050312	1	8
050312	3	8
050312	4	8
050312	6	8
050520	1	8
050410	1	8
050410	4	8
050410	5	8
050410	1	8
050410	4	8
050410	5	8
050509	2	7
050509	1	7
050509	2	7
050509	4	7
050509	2	7
050509	3	7
050509	4	7
050509	1	7
050509	2	7
050509	3	7
050509	4	7

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050419	1	7
050419	2	7
050419	5	7
050415	3	7
050415	6	7
050415	1	7
050415	2	7
050415	3	7
050415	6	7
050521	3	7
050521	4	7
050521	5	7
050512	1	7
050512	2	7
050512	1	7
050512	2	7
050512	3	7
050511	2	7
050511	1	7
050511	2	7
050511	1	7
050511	2	7
050516	1	7
050516	2	7
050516	5	7
050306	1	7
050306	1	7
050306	2	7
050316	1	7
050316	3	7
050316	4	7
050316	7	7
050705	1	7
050313	1	7
050313	2	7
050313	5	7
050313	7	7
050313	1	7

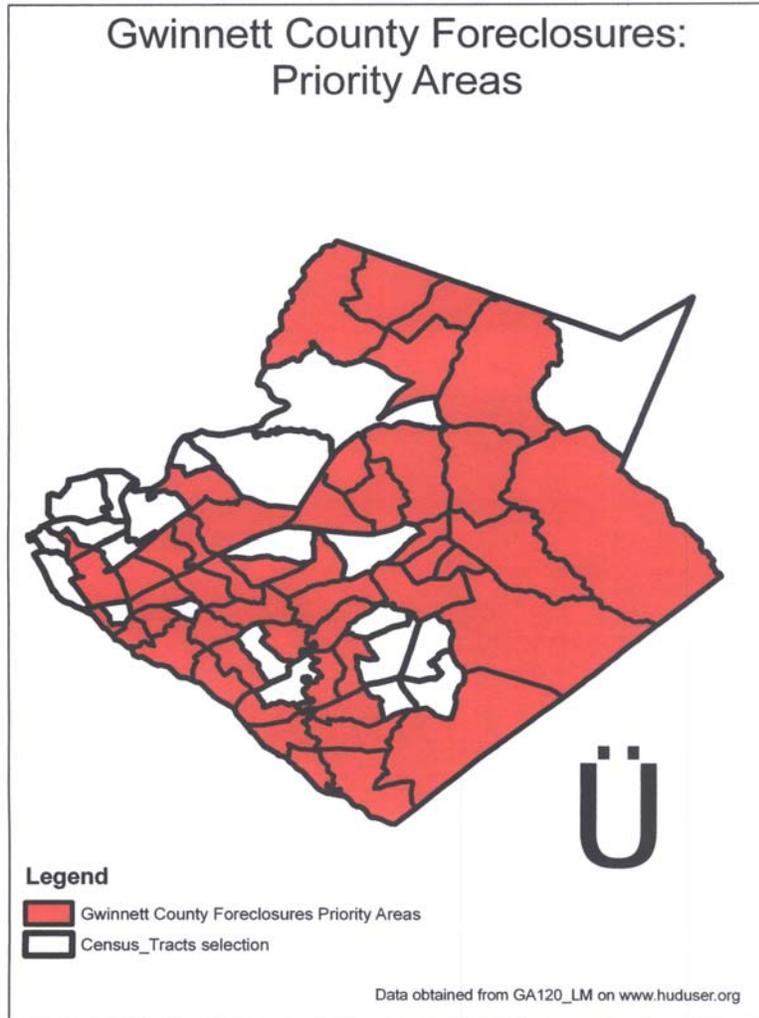
Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050313	2	7
050313	3	7
050313	4	7
050313	5	7
050313	7	7
050516	1	7
050516	2	7
050516	5	7
050103	2	7
050103	3	7
050103	4	7
050103	2	7
050103	3	7
050103	4	7
050103	2	7
050103	2	7
050103	3	7
050103	4	7
050430	3	7
050430	5	7
050430	2	7
050314	1	6
050314	2	6
050314	3	6
050314	4	6
050517	2	6
050517	1	6
050517	2	6
050517	3	6
050420	1	6
050420	2	6
050715	1	6
050715	1	6
050715	2	6
050705	1	6
050705	2	6
050705	2	6
050705	2	6
050705	1	6
050705	2	6
050705	1	6
050705	2	6

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050705	1	6
050705	2	6
050513	3	6
050602	4	6
050602	3	6
050602	4	6
050602	3	6
050602	4	6
050602	5	6
050602	3	6
050602	4	6
050720	1	6
050720	3	6
050720	4	6
050720	1	6
050720	3	6
050720	4	6
050304	1	6
050304	2	6
050304	8	6
050514	2	6
050513	1	6
050513	1	6
050513	1	6
050513	1	6
050513	2	6
050513	3	6
050510	1	6
050510	1	6
050510	2	6
050510	3	6
050514	2	6
050514	2	6
050514	1	6
050514	2	6
050426	4	6
050426	4	6
050426	5	6
050426	6	6
050426	7	6
050426	8	6
050426	9	6
050426	4	6

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050426	5	6
050427	1	6
050427	9	6
050427	1	6
050427	6	6
050427	9	6
050207	1	6
050207	1	6
050207	2	6
050207	3	6
050207	1	6
050207	2	6
050106	6	6
050106	7	6
050106	5	6
050106	6	6
050106	7	6
050106	5	6
050106	6	6
050106	7	6
050106	6	6
050106	7	6
050106	5	6
050106	6	6
050106	7	6
050403	1	5
050403	4	5
050403	9	5
050403	1	5
050403	2	5
050403	3	5
050403	4	5
050403	9	5
050429	4	5
050429	1	5
050429	7	5
050429	1	5
050429	4	5
050429	7	5
050603	1	5
050603	1	5
050429	4	5

Census Tract	Census Block Group	HUD Estimated foreclosure abandonment risk score
050429	7	5
050603	1	5
050603	1	5
050603	1	5
050603	2	5
050603	1	5
050603	2	5
050425	1	5
050425	2	5
050425	3	5
050425	1	5
050425	3	5
050206	1	5
050206	1	5
050206	1	5
050206	1	5
050206	1	5
050206	2	5
050206	3	5
050714	1	5
050714	2	5
050714	1	5
050714	2	5
050712	3	5
050712	1	5
050712	2	5
050712	3	5
050718	1	5
050718	2	5
050718	3	5
050718	1	5
050718	2	5
050718	3	5
050205	1	5
050205	1	5
050104	7	5
050104	6	5
050104	7	5
050104	6	5
050104	7	5
050104	6	5
050104	7	5
050104	6	5
050104	7	5

Map 1



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:

Since 2005, Gwinnett County has been one of three (3) counties in Georgia with the highest numbers of foreclosures of single-family owner-occupied housing. As a result of the large number of foreclosures in Gwinnett County, and the concomitant negative impact on the neighborhoods in which these structures are located, the County will utilize its NSP funds for the following activities:

1. The **Priority One** use of NSP grant funds and NSP Program Income will be to purchase and rehabilitate foreclosed single-family housing [detached housing and fee-simple townhomes], as necessary to comply with the Gwinnett County NSP Rehabilitation Standards [the HOME Program Property Standards]. Gwinnett County has adopted as its HOME Program Property Standards the Georgia Uniform Code Act [ICC Building Code, National Electrical Code, etc.], as implemented through the Gwinnett County Housing Rehabilitation Standards. The activity has been classified by HUD as a "Type B" activity under NSP rules.

The foreclosed homes purchased must be located in Census Tracts designated by Gwinnett County as "areas of greatest need" using HUD-supplied foreclosure and abandonment risk data, as updated using actual foreclosure data supplied by the Gwinnett County Tax Commissioner.

[Revision 12/30/08, in response to HUD review comments sent 12/24/08 - The data obtained from the Tax Commissioner was helpful but is not available in mappable formats consistent with Census boundaries. Information from the Georgia Department of Community Affairs and from commercial sources such as FMLS, Realtytrac.com, and the Mortgage Bankers Association will be used to supplement the foreclosure risk areas identified by HUD, thereby documenting the actual incidences of foreclosures and the incidences of sub-prime mortgage loans. New maps will be generated upon the initiation of NSP operations in Gwinnett County, with the assistance of Gwinnett County GIS personnel, to present the latest available information on concentrations of foreclosed properties, as well as areas with concentrations of sub-prime mortgage loans.]

This targeting strategy for the **Priority One** activity will ensure that the NSP funds are 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 Gwinnett County as likely to face a significant rise in the rate of home foreclosures.

The rehabilitated homes will be sold to homebuyers with total household incomes which are not greater than 120% of the Area Median Income [frequently referred to as Median Family Income] for Gwinnett County.

At least 25% of the funding expended for the acquisition/rehabilitation of these homes will be limited to homes sold to persons with total household incomes which do not exceed 50% of Area Median Income.

These maximum income levels are reflected in Table 2, which follows:

Table 2
NSP Maximum Income Limits – Gwinnett County, Georgia

% AMI	Household Size							
	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
50%	\$24,900	\$28,500	\$32,050	\$35,600	\$38,450	\$41,300	\$44,150	\$47,000
80%	\$39,850	\$45,550	\$51,250	\$56,950	\$61,500	\$66,050	\$70,650	\$75,200
120%	\$59,800	\$68,350	\$76,900	\$85,450	\$92,300	\$99,100	\$105,950	\$112,800

2. A **Priority Two activity** will be the use of NSP Grant or NSP Program Income funds to acquire foreclosed real property onto which new affordable housing will be constructed using private, and/or NSP, and/or HOME Program funds. This housing will be sold to households with total household incomes which are not greater than 120% of the Area Median Income for Gwinnett County [See Table 2, above.]. If HOME Program funds are used for construction costs or if HOME Program or ADDI funds are used to provide downpayment assistance to the homebuyers, the maximum income of these homebuyers would be capped at 80% AMI. This has been classified by HUD as a “Type E” activity under the rules of the NSP.

At least 25% of the homes constructed on real property purchased with NSP Grant or NSP Program Income funds or homes constructed wholly or partially with NSP grant or NSP Program Income funds will be sold to persons with total household incomes which do not exceed 50% of Area Median Income.

At least 25% of the homes constructed with NSP Program Income funds will be sold to homebuyers with household incomes which do not exceed 50% of Area Median Income.

The foreclosed real property purchased must be located in Census Tracts designated by Gwinnett County as “areas of greatest need” using HUD-supplied foreclosure and abandonment risk data, as updated using actual foreclosure data supplied by the Gwinnett County Tax Commissioner.

[Revision 12/30/08, in response to HUD review comments sent 12/24/08 and 12/29/08 - The data obtained from the Tax Commissioner was helpful but is not available in mappable formats consistent with Census boundaries. Information from the Georgia Department of Community Affairs and from commercial sources such as FMLS, Realtytrac.com, and the Mortgage Bankers Association will be used to supplement the foreclosure risk areas identified by HUD, thereby documenting the actual incidences of foreclosures and the incidences of sub-prime mortgage loans. New maps will be generated upon the initiation of NSP operations in Gwinnett

County, with the assistance of Gwinnett County GIS personnel, to present the latest available information on concentrations of foreclosed properties, as well as areas with concentrations of sub-prime mortgage loans.]

This targeting strategy for the **Priority Two activity** will ensure that the NSP Program Income is 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 Gwinnett County as likely to face a significant rise in the rate of home foreclosures.

[Revision 12/30/08, in response to HUD review comments sent 12/24/08 and 12/29/08]

General Strategy

Gwinnett County has directed its NSP funding toward homeownership because foreclosed residential homeownership properties predominate among foreclosures in the County. Although converting foreclosures previously occupied by homeowners to rental property may represent a strategy which is appropriate for some localities to ensure that 25% of their NSP funds are expended to benefit households at 50% Area Median Income [AMI], Gwinnett County remains committed to returning foreclosed properties to affordable homeownership for all qualifying households, including those at 50% AMI. The County will provide financial support for this process through the purchase of the most affordable properties and through the use of “soft second” deferred payment mortgages and through the use of downpayment assistance. Gwinnett County Habitat for Humanity and other non-profit providers of affordable housing, will be invited to participate in NSP to help make this goal achievable.

Gwinnett County will monitor the progress toward meeting the 25% investment requirement as a part of its monthly and quarterly progress assessment process. Adjustments will be made in program design, including the investment of NSP funds or program income in rental housing if the homeownership model is not achieving its performance goals.

Gwinnett County proposes one primary use of its NSP funds and Program Income: Acquire and Rehabilitate Foreclosed Single-Family Housing for Sale to Qualifying Homebuyers. Ten percent [10%] of the grant and program income funds will be used by Gwinnett County to administer its NSP.

A secondary use of NSP Program Income, if available, will be the acquisition of foreclosed residential property onto which affordable single-family housing will be constructed.

The County recognizes that focusing its NSP grant funds on one activity may pose a higher potential risk than some types of NSP eligible activities; however, the NSP rules instruct recipients of NSP funds to address their “areas of greatest area.” In Gwinnett County the “areas of greatest need” are both geographic and programmatic. Geographic areas are those with the highest numbers and percentages of foreclosures, those with the greatest concentrations of sub-prime loans, and the areas with the great problems with mortgage delinquencies. Programmatic “areas of greatest need” in Gwinnett County are the vast number of foreclosed residential properties previously occupied by homeowners. The County has chosen to address this programmatic need by maximizing the use of NSP funds to help return stability to neighborhoods through the most effective mechanism: owner occupied housing financed with affordable and fair financing instruments.

C. DEFINITIONS AND DESCRIPTIONS

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

Response:

The Gwinnett County Construction Code does not use the term “blighted structure,” but does define “Unsafe Buildings” under Section 1.02.5. Gwinnett County will use this “Unsafe Buildings” definition from its Construction Code as its “blighted structure” definition for the NSP:

“102.5. Unsafe Buildings or Systems

All buildings, structures, or electrical, gas, mechanical, energy conservation and plumbing systems which are unsafe, unsanitary, or do not provide adequate egress, or which constitute a fire hazards, or are other dangerous to human life, or which in relation to existing use, constitute a hazard to safety or health, are consider unsafe buildings or service systems. All such unsafe buildings, structures, energy conservation or service systems are hereby declared illegal and shall be abated by repair and rehabilitation or by demolition in accordance with the provisions of the Gwinnett County Unfit Building Abatement Code found at 42-26 of the Gwinnett County Code or Ordinances.”

“Section 42-26 [Abatement] of the Gwinnett County Code of Ordinances:

Where it is determined that there exists in the county dwelling or other building or structure which is unfit for human habitation or for commercial industrial, or business occupancy or use, or where there exists in the county a condition or use of real estate which renders adjacent real estate unsafe or inimical to safe human habitation; and where such determination is made by the director of the department of planning and development or his designated enforcement official, such official shall have the power to have repaired, closed or demolished any such dwelling, building or structure, or cause to be abated if any such unsafe or unsanitary conditions which create a public health hazard or general nuisance in accordance with the provision of O.C.G.A. [Official Code of Georgia, Annotated] Sections 41-2-7 through 41-2-17, where are hereby adopted and incorporated by reference within this section. [Code 1978, Section 9-1009].”

“Official Code of Georgia Annotated, 41-2-7:

§ 41-2-7. Power of counties and municipalities to repair, close, or demolish unfit buildings or structures; health hazards on private property; properties affected

(a) It is found and declared that in the counties and municipalities of this state there is the existence or occupancy of dwellings or other buildings or structures which are unfit for human habitation or for commercial, industrial, or business occupancy or use and not in compliance with the applicable state minimum standard codes as adopted by ordinance or operation of law or any optional building, fire, life safety, or other codes relative to the safe use of real property and real property improvements adopted by ordinance in the jurisdiction where the property is located; or general nuisance law and which constitute a hazard to the health, safety, and welfare of the people of this state; and that a public necessity exists for the repair, closing, or demolition of such dwellings, buildings, or structures. It is found and declared that in the counties and municipalities of this state where there is in existence a condition or use of real estate which renders adjacent real estate unsafe or inimical to safe human habitation, such use is dangerous and injurious to the

health, safety, and welfare of the people of this state and a public necessity exists for the repair of such condition or the cessation of such use which renders the adjacent real estate unsafe or inimical to safe human habitation. Whenever the governing authority of any county or municipality of this state finds that there exist in such county or municipality dwellings, buildings, or structures which are unfit for human habitation or for commercial, industrial, or business uses due to dilapidation and not in compliance with applicable codes; which have defects increasing the hazards of fire, accidents, or other calamities; which lack adequate ventilation, light, or sanitary facilities; or where other conditions exist rendering such dwellings, buildings, or structures unsafe or unsanitary, or dangerous or detrimental to the health, safety, or welfare, or otherwise inimical to the welfare of the residents of such county or municipality, or vacant, dilapidated dwellings, buildings, or structures in which drug crimes are being committed, power is conferred upon such county or municipality to exercise its police power to repair, close, or demolish the aforesaid dwellings, buildings, or structures in the manner provided in this Code section and Code Sections 41-2-8 through 41-2-17.

(b) All the provisions of this Code section and Code Sections 41-2-8 through 41-2-17 including method and procedure may also be applied to private property where there exists an endangerment to the public health or safety as a result of unsanitary or unsafe conditions to those persons residing or working in the vicinity. A finding by any governmental health department, health officer, or building inspector that such property is a health or safety hazard shall constitute prima-facie evidence that said property is in violation of this Code section and Code Sections 41-2-8 through 41-2-17.

(c) The exercise of the powers conferred upon counties in this Code section and in Code Sections 41-2-8 through 41-2-17 shall be limited to properties located in the unincorporated areas of such counties.”

(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:

Affordable Rents Definition: Although Gwinnett County has no intention to use its NSP grant funds or NSP Program Income for rental properties, for the purposes of the NSP Program, Gwinnett County defines Affordable Rents as the Fair Market Rents published annually by HUD for the Housing Choice Voucher Program [formerly known as the Section 8 Program].

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

Response:

Gwinnett County will ensure the continued affordability of NSP assisted housing by incorporating the use of Promissory Notes and Deeds to Secure Debt which contain recapture clauses and possibly the use of shared-equity loans.

Acquire/Rehabilitate/Sell Foreclosed Vacant Single-Family Housing
[Priority One Activity]

Loans to Developers/Asset Management Entities

The County will make loans from the NSP grant and/or Program Income funds to developers/asset management entities which will purchase and rehabilitate foreclosed single-family housing located in Gwinnett County's designated areas of greatest need. Promissory notes and deeds to secure debt will be used for these loans to developers/asset management entities to protect the affordability of the properties.

Loans to Homebuyers

Homebuyers who purchase homes which have been purchased/rehabilitated with NSP grant or Program Income funds from developers/asset management entities may receive "soft second" loans from the NSP Program. The amount of the "soft second" for each homebuyer will be determined by the loan underwriting process carried out by the Gwinnett County Community Development Program. The NSP homebuyer loans will be secured by promissory notes and deeds, which specify that the amount of the investment of NSP funds is secured by 0% loans to be repaid to Gwinnett County if the homes are sold during the 15 year loan term.

Gwinnett County may also make Downpayment Assistance loans to the NSP homebuyers from NSP grant or Program Income funds [homebuyers between 81%-120% AMI] or from HOME Program or ADDI funds [homebuyers at \leq 80% AMI]. The 0% Downpayment Assistance loans do not require repayment unless the homes are sold before the end of a five (5) year loan term. If the home is sold before the end of the five-year period, Downpayment Assistance funds are repaid to Gwinnett County.

Acquire Foreclosed Vacant Residential Real Property [Priority Two Activity]

Loans to Developers/Asset Management Entities

The County may make loans from NSP grant or Program Income funds to developers/asset management entities which will purchase vacant foreclosed single-family residential real property located in Gwinnett County's designated areas of greatest need. The loans with the developers/asset management entities will be secured with promissory notes and deeds to secure debt to protect the affordability of the properties.

Loans to Homebuyers

Homebuyers who purchase homes which are constructed upon real property [foreclosed vacant real property which have been purchased by developers/asset management entities using NSP Program Income from Gwinnett County] may receive "soft second" loans from NSP grant or Program Income funds. The NSP homebuyer loans will be secured by promissory notes and deeds, which specify that the amount of the investment of NSP funds is secured by the 0% loans to be repaid to Gwinnett County if the homes are sold during the 15 year loan term. At least 25% of the homes sold will be to homebuyers with total household incomes which do not exceed 50% of Area Median Income.

Gwinnett County may also make Downpayment Assistance loans to the NSP homebuyers from NSP funds [homebuyers between 81%-120% AMI] or from HOME Program or ADDI funds [homebuyers at \leq 80% AMI]. The 0% Downpayment Assistance Loans do not require repayment unless the homes are sold before the end of the five (5) year loan term. If the home is sold before the end of the five-year period, Downpayment Assistance funds are repaid to Gwinnett County.

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

Response:

Gwinnett County will use as its NSP Rehabilitation Standards its HOME Program Property Standards, which use the Georgia Uniform Code Act [ICC building Code, National Electrical Code, etc.], as implemented through the Gwinnett County Housing Rehabilitation Standards.

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: at least \$2,626,956.75.

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:

Gwinnett County will use 25% of its NSP allocation [at least \$2,626,956.75] plus 25% of any program income received to purchase and redevelop abandoned or foreclosed upon homes or residential properties which will house individuals or families whose incomes do not exceed 50 percent of area median income.

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., $\leq 80\%$ 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:

Gwinnett County expects to convert and demolish **no** (0) low- and moderate-income dwelling units (i.e., $\leq 80\%$ of area median income).

Affordable housing constructed to replace the demolished units will be:

Housing units expected to be made available to households \leq 120% of area median income. Not applicable – No demolitions.

Housing units expected to be made available to households \leq 80% of area median income. Not applicable – No demolitions.

Housing units made available to households \leq 50% of area median income. Not applicable – No demolitions.

F. PUBLIC COMMENT

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

Note: proposed NSP Substantial Amendment must be published via the usual methods and posted on the jurisdiction's website for no less than 15 calendar days for public comment.

Response:

All comments received during the 15-day public comment period will be included in the documentation submitted to HUD.

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

(1) Activity Name: **Purchase/Rehabilitate Foreclosed Single-Family Housing [Priority Activity One]**

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

NSP Eligible Use:

Purchase and Rehabilitation

Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties. [*HERA*, Sec 2301(c)(3)(B)] – NSP Type B

CDBG Eligible Use

Acquisition [24 CFR 570.201]

Disposition [24 CFR 570.201]

Rehabilitation [24 CFR 570.202]

Direct Homeownership Assistance [24 CFR 570.201]

Activity delivery costs for eligible activities defined in 24 CFR 570.206.

(3) National Objective: (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).

Benefit to low-, moderate-, middle income i.e., ≤ 120% of area median income).

(4) 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.

Response

The Gwinnett County designated “areas of greatest need” [see Table 1, Page 4, and see Map 1, Page 12] represent the Census Tracts with the high number of foreclosures, with the highest numbers of subprime loans, and which have the greatest risk of foreclosure and abandonment.

All homes assisted with NSP funds or NSP Program Income will be offered for sale to NSP-eligible households at affordable purchase prices with affordable fixed rate primary mortgages, with potential NSP financed “soft second” loans, and with potential Downpayment assistance provided from grant or Program Income funds from NSP, or from the HOME Program, or from the American Dream Downpayment Initiative [as determined by the household incomes of the homebuyers].

Through its grants management and oversight processes, Gwinnett County will ensure that at least 25% of the NSP funds expended will provide homeownership opportunities to homebuyers with incomes ≤50% AMI.

This activity will provide homeownership for the number of families identified in Item “11. Performance Measures.”

(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

Gwinnett County will focus the activity in Census Tracts which were identified by HUD as possessing a high risk for foreclosure or abandonment. See Page 2, Item A, and Table 1, Page 4, and Map 1, Page 12.

(6) 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):

Response:

Acquisition of Foreclosed Single-Family Homes/Townhomes	100 units
Rehabilitation of Foreclosed Single-Family Homes/Townhomes	100 units

Sale of Acquired/Rehabilitated Foreclosed Single-Family Homes/Townhomes:

Sale to NSP-eligible homebuyers [incomes between 81% & 120% AMI]	70 Units
Sale to NSP-eligible homebuyers [incomes between 51% & 80% AMI]	2 Units
Sale to NSP-eligible homebuyers [incomes ≤ 50% AMI]	<u>28 Units</u>
Total Units – NSP Program [Acquire/Rehab/Sell]	100

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

Response:

[Budget – Entire 5 Year Period]

Grant Amount Requested From HUD – All Activities/Administration	\$10,507,827
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Projected Activity Revenue:

NSP Grant Funds	\$ 9,457,044
Estimated Program Income from NSP Loans [63 loans @ \$100,000]	\$ 6,300,000
Estimated Private Funds [1st Mortgages] [63 loans at \$100,000]	<u>\$ 6,300,000</u>
	\$22,057,044

Note: The Estimated Private Funds generate the Estimated Program Income

Project Activity Expenditures:

Public Funds [NSP Grant – Purchase/Rehab Costs] [63 Units]	\$ 9,457,044
Public Funds [NSP Est. Program Income Purchase/Rehab Costs] [37 Units]	\$ 5,550,000
*Private Funds [63 mortgage loans at \$100,000]	\$ 6,300,000
Total	\$21,307,044

***Note: Private Funds from 63 mortgages will generate estimated \$6,300,000 in Program Income, of which \$5,550,000 is budgeted for this activity. The remaining \$750,000 from estimated Program Income is budgeted for Priority Activity Two.**

***Note: 25% of ESP grant funds [\$2,626,956.75] plus 25% of estimated Program Income [\$1,387,500] will be expended to purchase/rehabilitate and sell affordable single-family housing to homebuyers with total household income which does not exceed 50% of Area Median Income. This investment will fund 28 housing units.**

Administration Budget

Program Adm. Costs [10% of NSP Grant – 5 Year Budget]	\$ 1,050,782
Program Adm. Costs [10% of Est. Program Income– 5 Year Budget]	<u>\$ 630,000</u>
Total Activity Administration Budget [5 Year Budget]	\$ 1,680,782

(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

Gwinnett County Community Development Program
 [Under Supervision of the Gwinnett County Department of Financial Services]
 575 Old Norcross Road, Suite A
 Lawrenceville, GA 30045-4367
 Director: Craig Goebel
 Telephone: (770) 822-5190
 FAX: (770) 822-5193
 Email: craig.goebel@gwinnettcounty.com

(9) Projected Start Date: January 1, 2009

(10) Projected End Date: July 30, 2013

(11) Specific Activity Requirements

1. For acquisition activities, include:
 - discount rate

Response: Minimum 15% on the purchase of any and all individual foreclosed single-family homes or fee-simple townhomes.

2. For financing activities, include:
 - range of interest rates

Response: NSP “soft second” loans and Downpayment Assistance to homebuyers will be made at 0% interest.

4. For housing related activities, include:
 - a. tenure of beneficiaries--rental or homeownership;

Response: homeownership, only, no rental

- b. duration or term of assistance;

Response: “Soft-second” mortgages =15 year term/0% interest

- c. a description of how the design of the activity will ensure continued affordability.

Response: “Soft-second” mortgages will be secured by Promissory Notes and Deeds to Secure Debt which will require repayment of the NSP grant or Program Income funds if the properties are sold or ownership transferred during the loan term.

(1) Activity Name: **Redevelop Demolished or Vacant Properties [Priority Activity Two]**

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

NSP Eligible Use:

Redevelop demolished or vacant properties. [HERA Section 2301(c)(3)(E) – NSP Type E]

CDBG Eligible Uses

Acquisition [24 CFR 570.201]

Disposition [24 CFR 570.201]

New Housing Construction [24 CFR 570.201]

Direct Homeownership Assistance [24 CFR 570.201]

(3) National Objective: (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).

Benefit to low-, moderate-, middle income i.e., $\leq 120\%$ of area median income).

(4) 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.

The purchase/redevelopment of foreclosed vacant real property located in the Gwinnett County designated “areas of greatest need” [see the Table 1, Page 4, and Map 1, Page 12, with the identification of Census Tracts/Census Block Groups] will address the high number of foreclosures in these areas by offering homes constructed on this redeveloped property for sale to NSP-eligible households at affordable purchase prices with affordable fixed rate primary mortgages, with NSP financed “soft second” loans, and with Downpayment assistance provided from grant or Program Income funds from NSP, from the HOME Program, or from the American Dream Downpayment Initiative [as determined by the household incomes of the homebuyers].

Through its grants management and oversight processes Gwinnett County will ensure that at least 25% of the NSP funds expended will provide homeownership opportunities to homebuyers with incomes $\leq 50\%$ AMI.

This activity will provide homeownership for the number of families identified in Item “6. Performance Measures.”

(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

Gwinnett County will focus these activities in Census Tracts which were identified by HUD as possessing a high risk for foreclosure or abandonment. See Page 2, Item A, and Table 1, Page 4, and Map 1, Page 12.

(6) 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):

Response:

Acquire Foreclosed Residential Property [For Construction of Individual Single-Family Detached Homes or Townhomes]:

Acquire foreclosed single-family properties [Vacant Property] [Using Program Income received from the expenditure of NSP grant funds]	5 Units
Construct single-family housing units	5 Units
Sale to NSP-eligible homebuyers with incomes between 81% and 120% AMI	3 Units
Sale to NSP-eligible homebuyers with incomes between 51% and 80% AMI	0 Units
Sale to NSP-eligible homebuyers with incomes \leq 50% AMI	2 Units
Total Units – [New Construction]	5 Units

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

Grant Amount Requested From HUD – All Activities/Administration **\$10,507,827**

Projected Activity Revenue:

NSP Grant Funds	\$ 0
Estimated Program Income from Activity Priority One Purchase/Rehab NSP Loans	\$ 750,000
Estimated Private Funds [5 mortgage loans at \$100,000]	\$ 550,000
	\$ 1,300,000

Project Activity Expenditures:

Public Funds [NSP Est. Program Income Redevelop Vacant Properties] [5 Units]	\$ 750,000
*Private Funds [5 mortgage loans at \$100,000]	\$ 550,000
Total	\$ 1,300,000

***Note: 25% of NSP estimated Program Income [\$187,500] will be expended to purchase/rehabilitate and sell affordable single-family housing to homebuyers with total household income which does not exceed 50% of Area Median Income. This investment will fund 2 housing units.**

(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

Gwinnett County Community Development Program
[Under Supervision of the Gwinnett County Department of Financial Services]
575 Old Norcross Road, Suite A
Lawrenceville, GA 30045-4367
Director: Craig Goebel
Telephone: (770) 822-5190
FAX: (770) 822-5193
Email: craig.goebel@gwinnettcountry.com

(9) Projected Start Date: January 1, 2009

(10) Projected End Date: July 30, 2013

(11) Specific Activity Requirements

1. For acquisition activities, include:
- discount rate

Response: Minimum 15% on the purchase of any and all individual foreclosed single-family homes or fee-simple townhomes.

2. For financing activities, include:
- range of interest rates

Response: NSP “soft second” loans and Downpayment Assistance to homebuyers will be made at 0% interest.

5. For housing related activities, include:
- a. tenure of beneficiaries--rental or homeownership;

Response: homeownership, only, no rental

- b. duration or term of assistance;

Response: “Soft-second” mortgages =15 year term/0% interest

- c. a description of how the design of the activity will ensure continued affordability.

Response: “Soft-second” mortgages will be secured by Promissory Notes and Deeds to Secure Debt which will require repayment of the NSP grant or Program Income funds if the properties are sold or ownership transferred during the loan term.

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 \leq 120 of AMI.** The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.

(11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

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

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

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

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

11/21/2008

Signature/Authorized Official [Maria Woods]

Date

Acting Director, Gwinnett County Department of Financial Services
Title

PUBLIC NOTICE
GWINNETT COUNTY COMMUNITY DEVELOPMENT PROGRAM
PROPOSED CONSOLIDATED PLAN AMENDMENT
ACTION PLAN 2008
NEW PROGRAM ADDITION: NEIGHBORHOOD STABILIZATION PROGRAM [NSP]
PUBLICATION DATE: OCTOBER 31, 2008
PUBLISH IN: *GWINNETT DAILY POST*

Public comments are invited on a proposed amendment to **Gwinnett County Action Plan 2008**.

The Gwinnett County Board of Commissioners will consider the proposed amendment on **November 18, 2008** at 10:00 A.M. [Work Session] and at 2:00 P.M. [Business Meeting] in the Gwinnett County Justice and Administration Center, 1st Floor Auditorium, 75 Langley Drive, Lawrenceville, GA 30045-6900.

Written comments on the proposed amendment should be mailed to: Gwinnett County Community Development Program, 575 Old Norcross Road, Suite A, Lawrenceville, GA 30045-4367, sent by FAX [770-822-5193] or sent by email to: gchcd@gwinnettcountry.com. All written comments **MUST BE RECEIVED** by the Gwinnett County Community Development Program by **5:00 P.M. local time, November 14, 2008**. The public comment period for the NSP Period is 15 days, as specified in the rules governing the NSP Program.

The entire proposed amendment is available for review at the Gwinnett County Website: www.gwinnettcountry.com. After completion, the Final Amendment to Action Plan 2008 will also be posted at www.gwinnettcountry.com

Contact the Gwinnett County Community Development Program with questions or comments: Telephone: 770-822-5190; FAX 770-822-5193; TDD 770-822-5195; email: gchcd@gwinnettcountry.com.

PROPOSED AMENDMENTS
NEW: NEIGHBORHOOD STABILIZATION PROGRAM
ACTION PLAN 2008

The U.S. Department of Housing and Urban Development has announced the allocation of funding to Gwinnett County from the Neighborhood Stabilization Program [NSP] totaling \$10,507,827. The funding for the NSP is provided through the Housing and Economic Recovery Act of 2008 [HERA]. The intent of NSP is to assist localities which are suffering from residential foreclosures and the negative impact the foreclosures have on their neighborhoods.

Gwinnett County invites comments, herein, on its proposed uses of the NSP funds and any Program Income generated from the use of NSP grant funds.

HUD requires that localities receiving NSP funds direct the funds to the "areas of greatest need," which includes areas with the greatest numbers and percentages of home foreclosures, with the highest numbers and percentage of homes financed with subprime loans, and which are likely to face a significant rise in the rate of home foreclosures.

Area of Greatest Need

Gwinnett County proposes to direct its invest of NSP funds to the Census Tracts depicted on Map 1, which were identified in data received from HUD depicting areas with high risks for foreclosures. Further detailed targeting will occur using actual foreclosure data for the Year 2008.

Public comments received will be included in the application package submitted to HUD and will be provided to the Board of Commissioners prior to their action on November 18, 2008.

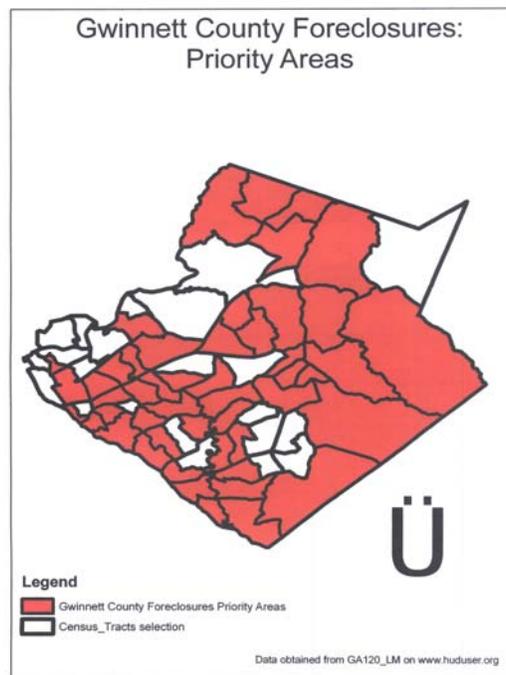
Gwinnett County must submit its application to HUD for NSP funds not later than December 1, 2008.

The program is expected to begin operation in early 2009, upon receipt of the actual award of NSP funds from the U.S. Department of Housing and Urban Development [HUD].

The Housing and Economic Recovery Act of 2008 [HERA] prohibits the use of NSP funds for any type of foreclosure prevention activity.

Program administration costs will be 10% of grant and program income funds received, as permitted by the NSP guidelines.

Map 1



Types of Activities Proposed

Priority Activity One:

The NSP funds will be used for repayable loans to developers/asset management entities which will purchase and rehabilitate vacant foreclosed single-family detached homes or fee-simple townhomes for sale to homebuyers whose incomes do not exceed 120% Area Median Income. The homes must be located in the Census Tracts depicted on Map 1. At least 25% of the NSP funds must be expended to acquire/rehabilitate housing units which are sold to households with incomes which do not exceed 50% Area Median Income. Homebuyers must qualify for primary mortgage to purchase NSP-assisted properties, and may qualify for “soft second” mortgages and/or Downpayment Assistance.

Total proposed NSP grant funding:	\$ 9,457,044
Total Estimated Program Income [from loan repayments]	<u>\$ 6,300,000</u>

Total Revenues	\$15,757,044
Total proposed expenditures	\$15,007,044

Total Proposed Numbers of Homes - Purchase/Rehabilitate/Sell to households not to exceed 120% Area Median Income 100
Total Proposed Numbers of Homes - Purchase/Rehabilitate/Sell to households not to exceed 50% of Area Median Income 28

Priority Activity Two:

If sufficient Program Income is received from loan repayments, the Program Income funds would be used for repayable loans to developers/asset management entities which will purchase vacant foreclosed properties which are negatively impacting neighborhoods, and will construct housing which is sold to homebuyers whose incomes do not exceed 120% Area Median Income. The foreclosed vacant properties must be located in the Census Tracts depicted on Map 1. At least 25% of the NSP funds must be expended to acquire vacant properties onto which new housing will be constructed, which are to be sold to households with incomes which do not exceed 50% Area Median Income.

Total proposed NSP estimated Program Income funding:	\$ 750,000 [Received From Priority Activity One]
Total Estimated Program Income [from loan repayments]	<u>\$ 500,000</u>
Total Revenues	\$ 1,300,000
Total proposed expenditures	\$ 1,300,000

Total Proposed Homes Constructed/Sold to households not to exceed 120% Area Median Income 5
Total Proposed Homes Constructed/Sold to households not to exceed 50% of Area Median Income 2

AMERICANS WITH DISABILITIES ACT OF 1990, AS AMENDED [ADA]

AND SECTION 504 ACCOMMODATIONS STATEMENT

Gwinnett County does not discriminate on the basis of disability in the admission or access to, or treatment or employment in, its programs or activities. Any requests for reasonable accommodations required by individuals to fully participate in any open meeting, program or activity of the Gwinnett County Community Development Program should be directed to Director, Gwinnett County Community Development Program, 575 Old Norcross Road, Suite A, Lawrenceville, GA 30045-4367. Telephone number 770-822-5190; FAX 770-822-5193; TDD 770-822-5195; email: gchcd@gwinnettcountry.com.

GCD Voucher: CD601192

Public Comments Received Are Presented in Attachment 1

NSP Substantial Amendment Checklist

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

Contents of an NSP Action Plan Substantial Amendment

Jurisdiction(s): <u>Gwinnett County, GA</u> <i>(identify lead entity in case of joint agreements)</i> Lead Agency: Community Development Program [Department of Financial Services] Jurisdiction Web Address: www.gwinnettcountry.com <i>(URL where NSP Substantial Amendment materials are posted)</i>	NSP Contact Person: <u>Craig Goebel, Director</u> Address: <u>Gwinnett County Comm. Dev. Program</u> <u>575 Old Norcross Road, Suite A</u> <u>Lawrenceville, GA 30045-4367</u> Telephone: <u>(770) 822-5190</u> Fax: <u>(770) 822-5193</u> Email: craig.goebel@gwinnettcountry.com
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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

A. AREAS OF GREATEST NEED

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

Yes No . Verification found on pages 2-3.

B. DISTRIBUTION AND USES OF FUNDS

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

Yes No . Verification found on pages 13-15.

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

C. DEFINITIONS AND DESCRIPTIONS

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

- a definition of “blighted structure” in the context of state or local law,
 Yes No . Verification found on page 16.

- a definition of “affordable rents,”
 Yes No . Verification found on page 17.

- a description of how the grantee will ensure continued affordability for NSP assisted housing,
Yes No . Verification found on pages 17-18.
- a description of housing rehabilitation standards that will apply to NSP assisted activities?
Yes No . Verification found on page 18.

D. LOW INCOME TARGETING

- Has the grantee described how it will meet the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
Yes No . Verification found on page 18, 19, 20-21, 23-24
- Has the grantee identified how the estimated amount of funds appropriated or otherwise made available will be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50% of area median income?
Yes No . Verification found on page 18, 19, 21-22, 23-24.
Grant Amount budgeted = \$2,626,956.75 [At least] – 18 Units
Estimated Program Income = \$1,387,500 – 10 Units

E. ACQUISITIONS & RELOCATION

Does grantee plan to demolish or convert any low- and moderate-income dwelling units?
Yes No . (If no, continue to next heading)
Verification found on page N/A – No Demolition Planned

Does the substantial amendment include:

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

Yes No . Verification found on N/A – No Demolition Planned

F. PUBLIC COMMENT PERIOD

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

Yes No . Verification found on pages 19, 28-30

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

Yes No . Verification found on pages 31, 40-50

G. INFORMATION BY ACTIVITY

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

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

If the activity includes acquisition of real property, the discount required for acquisition of foreclosed upon properties,

Yes No . Verification found on pages 22, 25.

If the activity provides financing, the range of interest rates (if any),

Yes No . Verification found on pages 22, 25.

If the activity provides housing, duration or term of assistance,

Yes No . Verification found on pages 22, 25.

- tenure of beneficiaries (e.g., rental or homeownership),
Yes No . Verification found on page 22, 25.
- does it ensure continued affordability?
Yes No . Verification found on page 22, 25.

H. CERTIFICATIONS

The following certifications are complete and accurate:

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

Application for Federal Assistance SF-424		Version 02
*1. Type of Submission:		*2. Type of Application * If Revision, select appropriate letter(s)
<input type="checkbox"/> Preapplication		<input checked="" type="checkbox"/> New
<input checked="" type="checkbox"/> Application		<input type="checkbox"/> Continuation *Other (Specify)
<input type="checkbox"/> Changed/Corrected Application		<input type="checkbox"/> Revision _____
3. Date Received:		4. Applicant Identifier: NSP -2008
5a. Federal Entity Identifier: UOG # 139135		*5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
*a. Legal Name: Gwinnett County, Georgia		
*b. Employer/Taxpayer Identification Number (EIN/TIN): 58-600083		*c. Organizational DUNS: 05-727-2734
d. Address:		
*Street 1:	Gwinnett Justice and Administration Center	
Street 2:	75 Langley Drive	
*City:	Lawrenceville	
County:	Gwinnett	
*State:	GA	
Province:	N/A	
*Country:	USA	
*Zip / Postal Code	30045-6900	
e. Organizational Unit:		
Department Name: Gwinnett County Board of Commissioners		Division Name: Gwinnett County Department of Financial Services
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	Ms.	*First Name: Tanikia
Middle Name:	S.	
*Last Name:	Jackson	
Suffix:		
Title:	Grants Manager	
Organizational Affiliation: Gwinnett County Department of Financial Services		
*Telephone Number: 770-822-7863		Fax Number: 770-822-7887
*Email: tanikia.jackson@gwinnettcounty.com		

Application for Federal Assistance SF-424	Version 02
<p>*9. Type of Applicant 1: Select Applicant Type: B.County Government</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p>Type of Applicant 3: Select Applicant Type:</p> <p>*Other (Specify)</p>	
<p>*10 Name of Federal Agency: U.S. Department of Housing and Urban Development</p>	
<p>11. Catalog of Federal Domestic Assistance Number: 14-218 _____</p> <p>CFDA Title: <u>Community Development Block Grant Program - Entitlement - Neighborhood Stabilization Program</u> _____</p>	
<p>*12 Funding Opportunity Number: N/A _____</p> <p>*Title: N/A _____</p>	
<p>13. Competition Identification Number: N/A _____</p> <p>Title: N/A _____</p>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.): Gwinnett County and all Participating Cities</p>	
<p>*15. Descriptive Title of Applicant's Project: Gwinnett County Neighborhood Stabilization Program - Amendment to Action Plan 2008 - Board of Commissioners Approval Date: November 18, 2008</p>	

Application for Federal Assistance SF-424	Version 02
<p>*Applicant Federal Debt Delinquency Explanation</p> <p>The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.</p> <p>Gwinnett County has no delinquent Federal debt.</p>	

Attachment 1
Public Comments Received

Protip Biswas, Executive Director, Regional Commission on Homelessness, United Way of Metropolitan Atlanta

Email Sent to Non-Profit Organizations Serving the Homeless

Did you know that Gwinnett **County has been granted \$10,507,827 as part of the Neighborhood Stabilization Program** under the Title III of Housing and Economic Recovery Act?

Please note that to get the money all jurisdictions must present a plan (**by December 1**) to HUD. It's a requirement in order to get the funds. It's also a requirement that 25% of the funds be targeted to those at 50% of the Area Median Income.

Who is working on this in Gwinnett? Have you all had any conversations or information on this program and the process? I think it's important that the Gwinnett Coalition weigh in on this to ensure that approach to projects that are included for those at 50% of area median income are realistic and include rental housing.

Debbie McMinn, Assistant Director, United Way of Gwinnett County

I spoke to Craig Goebel at the county and they are focusing on rehabbing foreclosed homes and making them available to folks like, school teachers, police officers, firemen, nurses who live and work in Gwinnett. The Gwinnett Chamber is working with the private sector and the banks who own these properties to help come up with a plan. Gwinnett is averaging 1200 foreclosures per month. (A total of over 12,000 since this past Jan.) All the information on the Neighborhood Stabilization Program will be on the Gwinnett County website this Friday [10/31/08].

Pat ZaVagnin, Executive Director, Positive Housing Solutions, Inc.

Gwinnett's Draft NSP is a good start to solving a very complicated problem. Priorities One and Two are clearly predicated on Gwinnett's large number of single-family owner-occupied foreclosures since 2005. The map shows approximately 80-85% of the county as priority areas, and these large numbers of foreclosures continue to negatively impact neighborhoods. We should consider not only the long-term stabilization of neighborhood houses, but also the stability of the homeowners themselves, some of whom may need intermittent or ongoing supportive services that go beyond just making affordable mortgage payments. But that may be another program. Nonetheless, we do express our interest in the foreclosure concerns facing Gwinnett, and we sincerely desire to become part of the solution.

HERA

Although state governments may choose to provide loans and grants through nonprofit subrecipients, including housing authorities, a local jurisdiction may apply for the grant and enter into subrecipient agreements with third parties to carry out activities.

Lawrenceville Housing Authority Capacity:

1. Organizational capacity and past experience with similar projects; readiness to begin implementation quickly.
2. Bring considerable property management and housing delivery skills into a productive partnership.
3. Experience in redevelopment of properties and capacity to handle large numbers of properties quickly.
4. Management of staff, vendors, and contractors in these activities.
5. Successfully serve the housing needs of very low income households and can help meet the 25% targeting requirement.
6. Such capacity plus the tight NSP timeframe and the strict requirement to use 25% of the funds for very low income households makes LHA logical partner in the program.

Potential Partnership Activities

1. Disposition of properties:
 - a. Transfer/sell acquired property to LHA to rent/sell to LMMI households
 - b. Ensures continued affordability
 - c. LHA absorbs operating costs (ineligible NSF activity)
 - d. Disposing of properties to operate as rental housing may help stabilize neighborhoods to a greater extent because of the support and oversight by projects that help maintain clients in stable arrangements
2. Developer of properties acquired by Gwinnett County
 - a. Lawrenceville Housing Authority has organizational capacity to rehabilitate acquired housing within given timeframes



Dear: Ms Tanikia Jackson,

I am writing to ensure that you are aware of a new funding opportunity for our community, and to make a recommendation for developing your plans for that opportunity.

HUD's new Neighborhood Stabilization Program (NSP) will provide emergency assistance state and local governments to acquire and redevelop foreclosed properties that might otherwise become sources of abandonment and blight within their communities.

NSP provides grants to every state and certain local communities to purchase foreclosed or abandoned homes and to rehabilitate, resell, or redevelop these homes in order to stabilize neighborhoods and stem the decline of house values of neighboring homes. The program is authorized under Title III of the recently passed Housing and Economic Recovery Act.

Under the law, local authorities must submit their budget plans for acquisition of foreclosed homes by December 1, 2008.

1. I am sure I join many who would ask that you submit plans for acquisition by the December 1 deadline and bring our fair share of the funds to our community.
2. In addition, I request that you strongly encourage/recommend/require home inspections the houses that your office will acquire under the NSP program.

While a home inspection is always a good idea, it is especially important in cases of abandonment and foreclosure. Such distressed properties often suffer from a lack of maintenance and repair.

A home inspection may be indispensable to your efforts. Clearly, your office will need to respond to taxpayers who wish to know the physical condition of the homes that will come under your management with NSP funds.

Further, future homebuyers whom we hope will eventually purchase these houses will need some assurance that they will be buying -- and your office will be selling -- houses that hav

been inspected for their technical condition. An independent, professional home inspection is the best available means to meet this need.

Thank you for your kind attention to these issues. I would appreciate knowing your plans to proceed. If I may be of help, I would be happy to answer questions about home inspections or provide other resource information that may assist you in this regard.

Please do not hesitate to contact me if I may be of service.

Sincerely,



(Brett Gordon)

(World Class Home Inspections LLC)

678-254-5690

Member, American Society of Home Inspectors



Paul Handy Inspection Services

705 Park Drive NE, Atlanta GA 30306-3661

Dear Ms. Jackson,

I am writing to ensure that you are aware of a new funding opportunity for our community, and to make a recommendation for developing your plans for that opportunity.

HUD's new Neighborhood Stabilization Program (NSP) will provide emergency assistance to state and local governments to acquire and redevelop foreclosed properties that might otherwise become sources of abandonment and blight within their communities.

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2. In addition, I request that you require home inspections for the houses that your office will acquire under the NSP program.

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A home inspection may be indispensable to your efforts. Clearly, your office will need to respond to taxpayers who wish to know the physical condition of the homes that will come under your management with NSP funds.

Further, future homebuyers whom we hope will eventually purchase these houses will need some assurance that they will be buying -- and your office will be selling -- houses that have been inspected for their technical condition. An independent, professional home inspection is the best available means to meet this need.

Thank you for your kind attention to these issues. I would appreciate knowing your plans to proceed. If I may be of help, I would be happy to answer questions about home inspections or provide other resource information that may assist you in this regard.

Please do not hesitate to contact me if I may be of service.

Sincerely,

Paul W. Chicoine

Paul Handy Inspection Services

Member, American Society of Home Inspectors

www.paulhandy.com 678-232-6996 paul_handy@bellsouth.net

THE BEST INSPECTIONS • EXCEPTIONAL FOLLOW-UP

Bryan Kerlin, City Manager, City of Buford

Will this program be administered similar to the CDBG programs in terms of City participation?

Response

HUD requires that the NSP funds be directed to the "areas of greatest need," which are those areas with the most home foreclosures, with the most subprime mortgage loans, and where mortgage delinquencies are highest. As a result, Gwinnett County has developed just such a targeting methodology using HUD supplied foreclosure risk data. The targeting will be fine-tuned prior to the activation of the NSP in early 2009. Based on the HUD supplied data and its use by Gwinnett County, much of the City of Buford is included in the "areas of greatest need" in the County's proposed application to HUD. [See attached.]

The strategy to attack the high numbers of foreclosures is to use a Request for Proposals process to solicit responses from for-profit and non-profit organizations which will acquire/rehabilitate/sell these foreclosed properties to qualifying homebuyers. The NSP funds will be loaned to these entities and upon sale, a portion of the sale price will be returned to the County to permit the acquisition/rehabilitation/sale of additional foreclosed homes. No NSP funds are proposed for the acquisition/rehabilitation of homes which will be used as rental property after sale.

The time permitted to obligate all of the NSP funds is 18 months from the date of award from HUD [sometime in January or February 2009].

If I can answer any additional questions, please let me know.

Craig Goebel
Director
Gwinnett County Community Development Program
[Staffing Provided by W. Frank Newton, Program Mgt. Firm for Gwinnett County]
575 Old Norcross Road, Suite A
Lawrenceville, GA 30045-4367
Telephone: 770-822-5190
FAX: 770-822-5193
TDD: 770-822-5195
email: craig.goebel@gwinnettcountry.com

Emails From/To Ms. Beverly Dryden, Citizen, Resident of Lawrenceville, Georgia

It is an estimate by HUD which addresses a high likelihood of foreclosures occurring, based on trend information in the general area, not restricted only to the City of Lawrenceville. We are working to get the actual locations of the foreclosures in Gwinnett County [unincorporated and within cities] mapped before the NSP Program gets underway in early 2009 when HUD actually provides the grant award contract to Gwinnett County.

Craig Goebel
Director
Gwinnett County Community Development Program
[Staffing Provided by W. Frank Newton, Program Mgt. Firm for Gwinnett County]
575 Old Norcross Road, Suite A
Lawrenceville, GA 30045-4367
Telephone: 770-822-5190
FAX: 770-822-5193
TDD: 770-822-5195
email: craig.goebel@gwinnettcountry.com

From: beverly dryden [mailto:kerdry@bellsouth.net]
Sent: Monday, November 10, 2008 1:25 PM
To: Goebel, Craig
Subject: Re: Neighborhood Stabilization Program Query

Thanks for the information. Does that mean that high risk foreclosures are within the city limits of Lawrenceville?

----- Original Message -----

From: Craig.Goebel@gwinnettcountry.com
To: kerdry@bellsouth.net
Sent: Monday, November 10, 2008 1:15 PM
Subject: RE: Neighborhood Stabilization Program Query

Ms. Dryden,

In response to your question about Lawrenceville, we looked at the HUD Data on areas with a higher risk of foreclosure around Lawrenceville.

The area between Duluth Highway/Old Norcross Road and U.S. 29] is the only part of Lawrenceville not included as presenting a high risk of foreclosure.

Craig Goebel
Director
Gwinnett County Community Development Program
[Staffing Provided by W. Frank Newton, Program Mgt. Firm for Gwinnett County]
575 Old Norcross Road, Suite A
Lawrenceville, GA 30045-4367
Telephone: 770-822-5190
FAX: 770-822-5193
TDD: 770-822-5195
email: craig.goebel@gwinnettcountry.com

From: beverly dryden [mailto:kerdry@bellsouth.net]
Sent: Thursday, November 06, 2008 3:09 PM
To: Goebel, Craig
Subject: Neighborhood Stabilization Program Query

Dear Mr. Goebel, I read with great interest in using government funds to rehabilitate foreclosed properties. However, I am unfamiliar with the census tracts and do not know where these white areas are located. I am especially interested in the area that appears to be near the city of Lawrenceville. Are any of the white areas within the city limits of Lawrenceville? Thanks Beverly Dryden

Emails From/To Ms. Stacy Ringo, The Preserve at Parkwood Homeowner Association:

Ms. Ringo,

The next application cycle for the CDBG Program will begin in February 2009. We have added you to our contact list and will notify you when we have our application preparation workshop.

Gwinnett County will also be receiving funding from HUD's new **Neighborhood Stabilization Program [NSP]** in early 2009. The proposed plan for the use of these funds is currently on the

Gwinnett County website: www.gwinnettcountry.com. Public Comments on the plan are being received through November 14, 2008.

The NSP will use a competitive process [Requests for Proposals] resulting in the selection of organizations with real estate development expertise and the financial capacity to acquire/rehabilitate and sell foreclosed single family homes in Gwinnett County. The NSP rules require that Gwinnett County target NSP investments into areas with the greatest need [i.e. (1) where the largest number/percentages of foreclosures have occurred; (2) where the largest numbers/percentages of sub-prime loans have been made; and, (3) where the greatest risk of future foreclosures continues to exist. Our staff will be working to refine the targeting information as soon as we receive the latest data from County tax records on the actual foreclosures which have occurred during the past 12 months.

The Request for Proposals process is currently under development and will also be placed on the County Website when it has been completed in late 2008. Organizations on our contact list will be notified when the Request for Proposals documents are available.

If you have comments or recommendations on the proposed NSP plan, please let share your comments with us by November 14, 2008, 5:00 P.M.

Craig Goebel
Director
Gwinnett County Community Development Program
[Staffing Provided by W. Frank Newton, Program Mgt. Firm for Gwinnett County]
575 Old Norcross Road, Suite A
Lawrenceville, GA 30045-4367
Telephone: 770-822-5190
FAX: 770-822-5193
TDD: 770-822-5195
email: craig.goebel@gwinnettcountry.com

From: s1ringo@aol.com [mailto:s1ringo@aol.com]
Sent: Thursday, November 06, 2008 5:01 PM
To: GCHCD
Cc: moorepheus251@yahoo.com; rhunt_21@yahoo.com; VMMcLarty@yahoo.com; shghebre@yahoo.com
Subject: Attention: Craig Goebel (CDBG Funding)

Good Afternoon Mr. Goebel,

On the behalf of the Preserve At Parkwood Homeowners Association, I am inquiring again about obtain information and an application for receiving CDBG Funds to acquire a foreclosed home. Please add me to any and all mailing lists pertaining to the CDBG program to receive information. The HOA's address is:

The Preserve at Parkwood HOA, Inc.
Attention: Stacy Ringo, Secretary
P.O. Box 390488
Snellville, GA 30039

Thank you in advance for your assistance with this matter.

Stacy Ringo

Email Comment Received:

From: Chuck Shelton [mailto:cshelton@viridianasset.com]
Sent: Monday, November 10, 2008 10:33 AM
To: GCHCD
Subject: Proposed amendment to Gwinnett County Action Plan 2008

Dear Sirs:

I am writing regarding Gwinnett County's plan for the Neighborhood Stabilization Program.

My comment is regarding the Rehabilitation Standards referenced under Activity/Priority One. It states that Gwinnett County is going to use the Georgia Uniform Code Act as implemented through the Gwinnett County Housing Rehabilitation Standards for its rehabilitation standards for the NSP.

Under the HERA of 2008, from which the NSP is derived, it says that the entitlement communities receiving funds under the NSP are "strongly encouraged" to incorporate energy-efficiency and modern green building standards in the rehabilitation of the properties under the NSP.

I'm not aware that the Georgia Uniform Code Act, or the Gwinnett County Housing Rehabilitation Standards have any specific energy-efficiency or modern green building standards. Will Gwinnett County be adding such standards to their requirements and if so, what will they be?

Thank you,

Chuck Shelton
Viridian Asset Management
cshelton@viridianasset.com
800 380-1736

Email Received from Rod Chrane, President, Workforce-Resource.com

Provided information to Gwinnett County on his company's web-based tool to connect low- to moderate-income homebuyers with providers of housing assistance.

Email From/To Rory Cunningham, President, Cunningham & Associates, Inc.

Mr. Cunningham,

Gwinnett County will be utilizing a Request for Proposals [RFP] process to solicit participation from interested developers/asset management entities for the NSP.

The publication of the RFP is not likely to occur until the Federal grant award is actually received by Gwinnett County - something in January 2009.

Please fax to us [770-822-5193] your company letterhead containing contact information...note on the fax that you are interested in being placed on the NSP Contact List.

We will place your company on the contact list for distribution of the RFP, when it is released.

Program details will be made available when they are completed.

Craig Goebel
Director
Gwinnett County Community Development Program

[Staffing Provided by W. Frank Newton, Program Mgt. Firm for Gwinnett County]
575 Old Norcross Road, Suite A
Lawrenceville, GA 30045-4367
Telephone: 770-822-5190
FAX: 770-822-5193
TDD: 770-822-5195
email: craig.goebel@gwinnettcountry.com

From: RORY CUNNINGHAM [mailto:RCUNNIN64@ALLTEL.NET]
Sent: Wednesday, November 05, 2008 2:56 PM
To: Goebel, Craig
Subject: NSP PROGRAM

Mr. Goebel,

My name is Rory Cunningham. I'm president of Cunningham & Associates, Inc. We are licensed building contractors and developers. I would like to get involved in the Neighborhood Stabilization Program. I have read the 37 page report that is one line. I would like to participate in the program in all avenues purchase, renovate and new construction. I do not see any information regarding how to either bid on these projects or qualify for the program.

Mr. Goebel, if you could help us with that information I would appreciate it.

I look forward to discussing this with you further.

Best Regards
Rory Cunningham

President
Cunningham & Associates, Inc
678-410-2073
706-216-3725

Email From/To Mr. Jeff Luther, President, Home-Probe, Inc.

Mr. Luther,

No final decisions have been made by Gwinnett County, at this time, on the details of NSP. However, it is most probable that the Gwinnett County government will not actually acquire foreclosed properties. It is more likely that the County will work through other entities to make the purchases. Final decisions on the details of the Gwinnett County NSP will occur in November.

We have an inspector already working for us who will perform the inspections for NSP and who already performs CDBG inspections.

We will add you to our contact list as one of the companies interested in NSP in Gwinnett.

Craig Goebel
Director
Gwinnett County Community Development Program
[Staffing Provided by W. Frank Newton, Program Mgt. Firm for Gwinnett County]
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Telephone: 770-822-5190
FAX: 770-822-5193

TDD: 770-822-5195
email: craig.goebel@gwinnettcountry.com

From: Jeff Luther [mailto:jeff@home-probe.com]
Sent: Monday, October 20, 2008 3:45 PM
To: GCHCD
Subject: CDBG and NSP

I am writing in reference to the above mentioned programs. I own an inspection company here in Georgia and am interested to know if you have taken inspections into account for your budget to be prepared in regard to the acquisition of foreclosed homes. Our company and our inspectors are well versed in foreclosed and distressed properties and property condition assessment. We could be of great value to Gwinnett County in that we are one of the few organizations with the ability to provide our own power to homes that most likely will have the power turned off by the local utility company. I would be interested in speaking with whomever may be in charge of writing this grant. I can be reached at the number below or be reply to this email address.

Thank you,

Jeff Luther
President
Home-Probe, Inc.
www.home-probe.com
404-218-1040

Meetings

City of Lawrenceville [Mayor, City Clerk, Planning Director]
Lawrenceville Housing Authority [Executive Director]
Gwinnett County Chamber of Commerce [Partnership Gwinnett] – Exec. VP, Econ. Dev.
Gwinnett County Habitat for Humanity, Executive Director
Gwinnett Housing Resource Partnership [d/b/a The IMPACT! Group], Executive Director
United Way in Gwinnett County, Director & Assistant Director
Georgia Department of Community Affairs, Assist. Commissioner

Email from Dorothy Altman, Staff, Gwinnett County Community Development Program – 10-10-2008

I just took a call from Lori at the GJAC information desk. They are receiving inquiries about the \$10M Gwinnett County has received for NSP. Her question was to whom should we refer inquiries and where can details be found. I told her that the program was just now in development and no details were firm. I suggested that she send all inquiries to Gwinnett County Housing and Community Development at GCHCD@gwinnettcountry.com. I told her that this email is checked daily and all messages receive prompt replies.

Attachment 7

Gwinnett County Application
Requesting
Neighborhood Stabilization Program
Direct Allocation Pool Funds
From
Georgia Department of Community Affairs
January 15, 2009

Pictures – Typical Foreclosed Homes in Gwinnett County
Located in Priority Investment Areas

GWINNETT COUNTY NEIGHBORHOOD STABILIZATION PROGRAM

Typical Foreclosures within Target Areas

**4499 Ashlyn Rebecca Drive
Snellville, GA 30039**



**708 Austin Creek Drive
Buford, GA 30518**



GWINNETT COUNTY NEIGHBORHOOD STABILIZATION PROGRAM
Typical Foreclosures within Target Areas

**427 Stokesay Drive
Lawrenceville, GA 30045**



**5886 Dana Drive
Norcross, GA 30093**



**717 Loiness Court
Stone Mountain, GA 30087**

