# **Action Plan**

**Grantee:** San Joaquin County, CA

Grant: B-08-UN-06-0005

**LOCCS Authorized Amount:** \$ 9,030,385.00 **Grant Award Amount:** \$ 9,030,385.00

**Status:** Reviewed and Approved

**Estimated PI/RL Funds:** \$ 16,000,000.00

**Total Budget:** \$ 25,030,385.00

### **Funding Sources**

Funding Source Funding Type

Neighborhood Stabilization Program Other Federal Funds

#### **Narratives**

#### **Areas of Greatest Need:**

San Joaquin County is located in the central valley region of California, an area that experienced a considerable amount of residential growth and property value appreciation in the late 1990's through 2005. Because of this, the Stockton/San Joaquin County area has been significantly impacted by the current foreclosure crisis. Available data indicates that the San Joaquin County area has the highest rate nationally of foreclosures per housing unit. In determining areas of greatest need, HUD requires that the San Joaquin County Urban County entitlement jurisdictions (unincorporated San Joaquin County and the cities of Escalon, Lathrop, Lodi, Manteca, Ripon and Tracy) identify areas with a high percentage of subprime or high cost mortgages, high rate of foreclosures, and at risk of further decline through foreclosures or abandonment. San Joaquin County has been tracking and mapping foreclosures in the county since January 2007. This data along with HUD provided estimates of foreclosure risk data, and loan origination data was used to determine the areas of greatest need for Neighborhood Stabilization Program (NSP) funding within San Joaquin County. The following census tract block groups have been identified by the County and Urban County jurisdictions, as the priority areas of the greatest need. A map of these identified Areas of Greatest Need is attached as Exhibit A. The County will initially start utilizing NSP funding in these census tract block groups, then move into other areas identified with a high percentage of home foreclosures, if funding is available. JURISDICTION CENSUS TRACT AND BLOCK GROUP(S) DISTRICT RISK INDEX UNINCORPORATED COUNTY Garden Acres CT: 27.01 BG: 1-4 2 8 CT: 27.02 BG: 1-3 2 9 Gianone Park CT: 17.00 BG: 1-3 1 9 Country Club CT: 10.00 BG: 1 3 9 CT: 11.02 BG: 1, 3, 4 1 10 Boggs Tract CT: 8.00 BG: 1 1 10 CITY OF ESCALON CT: 49.01 BG: 2 4 8 CITY OF LATHROP CT: 51.27 BG: 1-2 3 8 CITY OF LODI CT: 42.03 BG: 2-3 4 9 CT: 44.02 BG: 1-2 4 9 CT: 45.00 BG: 1-4 4 9 CITY OF MANTECA CT: 51.08 BG: 1-3 3 9 CT: 51.09 BG: 1-4 3 8 CITY OF RIPON CT: 50.01 BG: 2 5 7 CITY OF TRACY CT: 53.02 BG: 2 5 8 CT: 53.03 BG: 1-5 5 10 CT: 53.05 BG: 1-2 5 9 CT: 54.04 BG: 1-4 5 9 The County will target all of the NSP activities in these high priority areas. However, activities may occur outside these high-priority areas if an opportunity arises or the implementation schedule dictates expanding the program to other areas with a concentration of foreclosures.

#### Distribution and and Uses of Funds:

San Joaquin County will prioritize the use of NSP funding by targeting its activities in the areas identified as high priority areas. However, activities may occur outside these high-priority areas if an opportunity arises or the implementation schedule dictates expanding the program to other areas with a concentration of foreclosures. NSP funding has been allocated to each participating jurisdiction based primarily on the proportion of overall foreclosures in San Joaquin County, by jurisdiction. NSP funding allocation is proposed as follows: 1. Acquisition/Rehabilitation/Resale of Foreclosed Residential Properties (\$5,669,751). The Urban County will focus it's acquisition, rehabilitation, and resale on housing units in the census tract block groups identified as priority areas with the greatest need. The design of this activity is to provide income eligible households at or above 51% to 120% of Area Median Income. Initial acquisition of properties will average at least 15% below a current appraised value. The sales price will be no greater than the total investment by the Urban County jurisdictions (including acquisition, rehabilitation and associated program delivery costs). The property will have deed restrictions recorded against it throughout the 30-year



affordability period. Shared appreciation shall be included in loan repayment, if before 30 years. Shared appreciation is a percentage of the difference between the original purchase price of the real property and the price at which it is sold. The shared appreciation percentage is calculated by dividing the amount of the home loan by the original purchase price of the real property. In cases where transfer of the real property to another party by means other than sale (with exception of a creditor taking title or interest therein), the appreciation is the difference between the original purchase price and the appraised value of the real property at the time of transfer. 2. Acquisition/Rehabilitation/Rental of Foreclosed Residential Properties. San Joaquin County will set-aside at least \$2,257,597 (25% of the County's NSP allocation) available for purchase, redevelopment of foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50% of the areas median income. Programs to meet this goal may include single family rental housing, multi-family rental housing or congregate housing for special needs populations. 3. Acquisition/Demolition of Blighted Structures/Redevelopment (\$200,000). This activity is for acquisition/demolition/redevelopment of vacant, foreclosed single family properties that would require more funds to rehabilitate than to demolish and rebuild. If the properties are determined to be demolished, they will then be made available to a non-profit housing provider to plan the redevelopment of the property as soon as feasible. Redevelopment may include sale of the property at current fair market value, or below current fair market value, or partnership with the non-profit agency. 4. Administration (\$903,038). A maximum of 10% of NSP funds will be used to cover costs associated with program planning, implementation, and administration. It is anticipated that actual costs will be less than the maximum allowed. The remainder will be transferred to other NSP activities, NSP Allocation \$2,257,596 50% AMI Set-Aside UC Total; \$5,869,750 Net Allocation Escalon 66 1,12% \$65,762 Escalon Lathrop 648 11.00% \$645,663 Lathrop Lodi 580 9.85% \$577,908 Lodi Manteca 1121 19.03% \$1,116,956 Manteca Ripon 120 2.04% \$119,567 Ripon Tracy 1895 32.17% \$1,888,164 Tracy Uninc. County (inc \$1,455,730 Uninc. County 100.00% \$5,869,750 Total Net Allocation. On September 7, 2010 The San Joaquin County Board of Supervisors authorized the reallocation of \$1,029,157 of program income, generated fron the sale of purchased foreclosed properties, to the rehabilitation of the Las Palmas Apartments (now called Sienna Terrace). Proje

Definitions	and	Descri	ptions

Low Income Targeting:

**Acquisition and Relocation:** 

**Public Comment:** 

# **Project Summary**

Project #	Project Title	Grantee Activity #	Activity Title
9999	Restricted Balance	No activities in t	nis project
NSP-1	Acquisition/Rehabilitation/Resale	NSP-09-01	STAND Activities
		NSP-09-02	Visionary Homebuilders Activities
		NSP-09-03	Service First Activities
		NSP-09-07	STAND Activities LH25
		NSP-09-08	Visionary Homebuilders Activities LH25
		NSP-09-09	Service First Activities LH25
NSP-2	Acquisition/Rehabilitation/Rental	NSP-09-06 El Dorado	Acq/Rehab Multifamily LH25
		NSP09-05	Low Income Rental
NSP-3	Acquisition/Demolition/Redevelop	NSP-09-04	Service First Demolition
NSP-4	Administration	NSP-09-099	NSP Administration



## **Activities**

## Project # / Title: NSP-1 / Acquisition/Rehabilitation/Resale

**Grantee Activity Number:** NSP-09-01

Activity Title: STAND Activities

Activity Type: Activity Status:

Rehabilitation/reconstruction of residential structures Under Way

Project Number: Project Title:

NSP-1 Acquisition/Rehabilitation/Resale

Projected Start Date: Projected End Date:

03/11/2009 09/10/2011

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:

Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked **Total Budget:** \$7,173,665.37

National Objective: Most Impacted and

LMMI: Low, Moderate and Middle Income National Objective for NSP Only

Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

**Total Funds:** \$7,173,665.37

#### **Benefit Report Type:**

Direct (Households)

Proposed Beneficiaries	Total	Low	Mod	Low/Mod%
# Owner Households	35	28	7	100.00
# of Households	35	28	7	100.00

Proposed AccomplishmentsTotal# of Singlefamily Units35# of Housing Units35# of Properties35



Activity is being carried out by Grantee:

Activity is being carried out through:

No

Organization carrying out Activity:

San Joaquin County Community Development Dept.

Proposed budgets for organizations carrying out Activity:

**Responsible Organization** 

San Joaquin County Community Development Dept.

**Organization Type** 

**Proposed Budget** 

Unknown

\$7,173,665.37

**Location Description:** 

Identified target areas in the cities of Stockton, Manteca, Escalon and Ripon.

**Activity Description:** 

Purchase, rehabilitate and re-sell foreclosed single family residential units to qualified homebuyers.

**Environmental Assessment:** COMPLETED



Activity Title: Visionary Homebuilders Activities

Activity Type: Activity Status:

Rehabilitation/reconstruction of residential structures Under Way

Project Number: Project Title:

NSP-1 Acquisition/Rehabilitation/Resale

Projected Start Date: Projected End Date:

03/11/2009 09/10/2011

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:

Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked **Total Budget:** \$4,298,399.89

National Objective: Most Impacted and

LMMI: Low, Moderate and Middle Income National Objective for NSP Only

Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

**Total Funds:** \$4,298,399.89

**Benefit Report Type:** 

Direct (Households)

 Proposed Beneficiaries
 Total
 Low
 Mod
 Low/Mod%

 # Owner Households
 30
 24
 6
 100.00

 # of Households
 30
 24
 6
 100.00

Proposed AccomplishmentsTotal# of Singlefamily Units30# of Housing Units30# of Properties30

Activity is being carried out by Grantee: Activity is being carried out through:

No

**Organization carrying out Activity:** 

San Joaquin County Community Development Dept.

Proposed budgets for organizations carrying out Activity:

Responsible Organization Organization Type Proposed Budget

San Joaquin County Community Development Dept.

Unknown \$4,298,399.89



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Identified target areas in the unincorporated San Joaquin County and the cities of Tracy and Manteca.

## **Activity Description:**

Purchase, rehabilitate and resell foreclosed single family residential units to qualified homebuyers.

**Environmental Assessment:** COMPLETED



Activity Title: Service First Activities

Activity Type: Activity Status:

Rehabilitation/reconstruction of residential structures Under Way

Project Number: Project Title:

NSP-1 Acquisition/Rehabilitation/Resale

Projected Start Date: Projected End Date:

03/11/2009 09/10/2011

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:

Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked Total Budget: \$1,463,000.24

National Objective: Most Impacted and

LMMI: Low, Moderate and Middle Income National Objective for NSP Only

Distressed Budget: \$0.00

Other Funds: \$0.00

**Total Funds:** \$ 1,463,000.24

**Benefit Report Type:** 

Direct (Households)

 Proposed Beneficiaries
 Total
 Low
 Mod
 Low/Mod%

 # Owner Households
 10
 8
 2
 100.00

 # of Households
 10
 8
 2
 100.00

Proposed AccomplishmentsTotal# of Singlefamily Units10# of Housing Units10# of Properties10

Activity is being carried out by Grantee: Activity is being carried out through:

No

Organization carrying out Activity:

San Joaquin County Community Development Dept.

Proposed budgets for organizations carrying out Activity:

Responsible Organization Organization Type Proposed Budget

San Joaquin County Community Development Dept.

Unknown \$1,463,000.24



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Identified target areas in the unincorporated San Joaquin County and the cities of Lathrop and Lodi.

## **Activity Description:**

Purchase, rehabilitate and resell single family units to qualified homebuyers.

**Environmental Assessment:** COMPLETED



Activity Title: STAND Activities LH25

Activity Type: Activity Status:

Rehabilitation/reconstruction of residential structures Under Way

Project Number: Project Title:

NSP-1 Acquisition/Rehabilitation/Resale

Projected Start Date: Projected End Date:

11/04/2010 07/27/2012

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:

Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked Total Budget: \$ 361,289.69

National Objective: Most Impacted and

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

**Total Funds:** \$ 361,289.69

**Benefit Report Type:** 

Direct (Households)

Proposed BeneficiariesTotalLowModLow/Mod%# Owner Households44100.00# of Households44100.00

Proposed Accomplishments

# of Singlefamily Units

4

# of Housing Units

4

Activity is being carried out by Grantee: Activity is being carried out through:

Yes Grantee Employees

**Organization carrying out Activity:** 

San Joaquin County Community Development Department

Proposed budgets for organizations carrying out Activity:

Responsible Organization Organization Proposed Budget

San Joaquin County Community Development Department Local Government \$ 361,289.69

**Location Description:** 



Projects were located in the unincorporated areas of Stockton, CA.

#### **Activity Description:**

STAND acquired four single family properties to rehabilitate and sell to four very low income households.

**Environmental Assessment:** COMPLETED



Activity Title: Visionary Homebuilders Activities LH25

Activity Type: Activity Status:

Rehabilitation/reconstruction of residential structures Under Way

Project Number: Project Title:

NSP-1 Acquisition/Rehabilitation/Resale

Projected Start Date: Projected End Date:

11/04/2010 07/27/2012

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:

Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked Total Budget: \$ 196,849.00

National Objective: Most Impacted and

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

**Total Funds:** \$ 196,849.00

**Benefit Report Type:** 

Direct (Households)

Proposed BeneficiariesTotalLowModLow/Mod%# Owner Households11100.00# of Households11100.00

Proposed Accomplishments

# of Singlefamily Units

1

# of Housing Units

1

Activity is being carried out by Grantee: Activity is being carried out through:

Yes Grantee Employees

**Organization carrying out Activity:** 

San Joaquin County Community Development Department

Proposed budgets for organizations carrying out Activity:

Responsible Organization Organization Type Proposed Budget

San Joaquin County Community Development Department Local Government \$196,849.00

**Location Description:** 



Project is located in the unincorporated area of Stockton, CA.

#### **Activity Description:**

Visionary Homebuilders purchased one single family residence to rehabilitate and sell to a very low income homebuyer.

**Environmental Assessment:** COMPLETED



Activity Title: Service First Activities LH25

Activity Type: Activity Status:

Rehabilitation/reconstruction of residential structures Under Way

Project Number: Project Title:

NSP-1 Acquisition/Rehabilitation/Resale

Projected Start Date: Projected End Date:

11/04/2010 07/27/2012

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:

Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked Total Budget: \$130,515.00

National Objective: Most Impacted and

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

**Total Funds:** \$ 130,515.00

**Benefit Report Type:** 

Direct (Households)

Proposed BeneficiariesTotalLowModLow/Mod%# Owner Households11100.00# of Households11100.00

Proposed Accomplishments

# of Singlefamily Units

1

# of Housing Units

1

Activity is being carried out by Grantee: Activity is being carried out through:

Yes Grantee Employees

**Organization carrying out Activity:** 

San Joaquin County Community Development Department

Proposed budgets for organizations carrying out Activity:

Responsible Organization Organization Type Proposed Budget

San Joaquin County Community Development Department Local Government \$130,515.00

**Location Description:** 



Property is located in the unincorporated area of Stockton, CA.

#### **Activity Description:**

Service First purchased one single family residence to rehabilitate and sell to a very low income homebuyer.

**Environmental Assessment:** COMPLETED

Environmental Reviews: None

Project # / Title: NSP-2 / Acquisition/Rehabilitation/Rental

Grantee Activity Number: NSP-09-06 El Dorado

Activity Title: Acq/Rehab Multifamily LH25

Activity Type: Activity Status:

Rehabilitation/reconstruction of residential structures Under Way

Project Number: Project Title:

NSP-2 Acquisition/Rehabilitation/Rental

Projected Start Date: Projected End Date:

02/01/2014 09/30/2014

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:

Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked Total Budget: \$749,645.95

National Objective: Most Impacted and

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

**Total Funds:** \$ 749,645.95

**Benefit Report Type:** 

Direct (Households)

Proposed Beneficiaries	Total	Low	Mod	Low/Mod%
# Renter Households	35	35		100.00
# of Households	35	35		100.00



**Proposed Accomplishments** 

Total

# of Multifamily Units

25

# of Housing Units

25

Activity is being carried out by Grantee:

Activity is being carried out through:

No

Organization carrying out Activity:

San Joaquin County Community Development Department

Proposed budgets for organizations carrying out Activity:

**Responsible Organization** 

Organization Type

**Proposed Budget** 

San Joaquin County Community Development Department

Local Government

\$ 749,645.95

**Location Description:** 

1700 South El Dorado Street in Stockton, CA.

**Activity Description:** 

Acquisition of a multi-family housing complex with at least 25 units to be rehabilitated and then rented to very low-income household.

**Environmental Assessment:** COMPLETED



Activity Title: Low Income Rental

Activity Type: Activity Status:

Rehabilitation/reconstruction of residential structures Under Way

Project Number: Project Title:

NSP-2 Acquisition/Rehabilitation/Rental

Projected Start Date: Projected End Date:

03/17/2010 03/17/2012

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:

Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked **Total Budget:** \$ 3,334,056.21

National Objective: Most Impacted and

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

**Total Funds:** \$ 3,334,056.21

**Benefit Report Type:** 

Direct (Households)

Proposed Beneficiaries	Total	Low	Mod	Low/Mod%
# Renter Households	25	25		100.00
# of Households	25	25		100.00

Proposed Accomplishments	Total
# of Multifamily Units	25
# of Housing Units	25
# ELI Households (0-30% AMI)	
#Units with bus/rail access	25
#Low flow showerheads	25
#Low flow toilets	25
#Light fixtures (outdoors) replaced	20
#Light Fixtures (indoors) replaced	75
#Replaced thermostats	25
# of Properties	1



Activity is being carried out by Grantee:

Activity is being carried out through:

No

**Organization carrying out Activity:** 

San Joaquin County Community Development Dept.

Proposed budgets for organizations carrying out Activity:

Responsible Organization Organization Proposed Budget

San Joaquin County Community Development Dept.

Unknown \$3,334,056.21

**Location Description:** 

In July 2010 the County acquired the Las Palmas Apartments at 4215 N. Pershing Ave., Stockton. Las Palmas is a 43 unit multifamily complex comprised of a mix of studio, 1 bedroom and 2 bedroom units.

**Activity Description:** 

The original set-aside value of \$2,257,596 was used to acquire the property and to pay for miscellaneous acqusition, predevelopment and tenant relocation costs. On September 7, 2010, the County Board of Supervisors at a public hearing authorized the reallocation of \$1,029,157 of NSP1 program income to rehabilitate the apartment complex. Once completed, Las Palmas will provide affordable housing to households whose incomes are at or below 50% of the County's Area Median Income. The Rehabilitation work should be completed in March 2011 and units will be available for occupancy incrementally throughout the rehabilitation.

Environmental Assessment: UNDERWAY

Environmental Reviews: None

Project # / Title: NSP-3 / Acquisition/Demolition/Redevelopment

Grantee Activity Number: NSP-09-04

Activity Title: Service First Demolition

Activity Type: Activity Status:

Clearance and Demolition Completed

Project Number: Project Title:

NSP-3 Acquisition/Demolition/Redevelopment

Projected Start Date: Projected End Date:

03/11/2009 09/10/2011

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:



Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked **Total Budget:** \$ 99,010.00

National Objective: Most Impacted and

LMMI: Low, Moderate and Middle Income National Objective for **Distressed Budget:** \$ 0.00

NSP Only **Other Funds:** \$ 99,010.00 **Total Funds:** \$ 198,020.00

**Benefit Report Type:** 

Direct (Households)

Proposed Beneficiaries Total Low Mod Low/Mod%

# of Households 2 1 1 1 100.00

Proposed AccomplishmentsTotal# of Singlefamily Units2# of Housing Units2# of Properties1

Activity is being carried out by Grantee: Activity is being carried out through:

No

**Organization carrying out Activity:** 

San Joaquin County Community Development Dept.

Proposed budgets for organizations carrying out Activity:

Responsible Organization Organization Type Proposed Budget

San Joaquin County Community Development Dept.

Unknown \$200,000.00

Funding Source Name Matching Funds Funding Amount

Neighborhood Stabilization Program No \$99,010.00

**Location Description:** 

Identified target areas in the City of Lodi.

**Activity Description:** 

Purchase substandard, vacant, foreclosed residential unit, demolish unit and build two residential structures to be sold to qualified households.

**Environmental Assessment:** COMPLETED



Project # / Title: NSP-4 / Administration

**Grantee Activity Number:** NSP-09-099

Activity Title: NSP Administration

Activity Type: Activity Status:

Administration Under Way

Project Number: Project Title:

NSP-4 Administration

Projected Start Date: Projected End Date:

03/11/2009 09/10/2011

Project Draw Block by HUD: Project Draw Block Date by HUD:

Not Blocked

Activity Draw Block by HUD: Activity Draw Block Date by HUD:

Not Blocked

**Block Drawdown By Grantee:** 

Not Blocked **Total Budget:** \$875,454.07

National Objective: Most Impacted and

LMMI: Low, Moderate and Middle Income National Objective for **Distressed Budget:** \$ 0.00

NSP Only Other Funds: \$ 0.00

**Total Funds:** \$ 875,454.07

**Benefit Report Type:** 

NA

Activity is being carried out by Grantee: Activity is being carried out through:

No

**Organization carrying out Activity:** 

San Joaquin County Community Development Dept.

Proposed budgets for organizations carrying out Activity:

Responsible Organization Organization Proposed Budget

San Joaquin County Community Development Dept.

Unknown \$875,454.07



#### **Location Description:**

1810 E. Hazelton Ave., Stockton, CA 95205

#### **Activity Description:**

Administer and manage the San Joaquin County Neighborhood Stabilization Program

**Environmental Assessment:** EXEMPT

Environmental Reviews: None

## **Action Plan Comments:**

Reviewer - This Plan change includes the attribution of projected program income and the reallocation of \$110,990 from activity NSP-09-04, Demolition, to NSP-09-05, Rental Housing. This action completes the Demolition activity.

Reviewer - AP rejected so grantee can provide more specific activity locations and activity description. PDF with comments embedded attached to review checklist.

# **Action Plan History**

Date
08/25/2009
02/10/2011
01/12/2012
02/07/2012
02/10/2012
07/02/2013
10/23/2013
01/15/2014



B-08-UN-06-0005 AP#9 04/02/2014 B-08-UN-06-0005 AP#10 02/02/2018

