

Action Plan

Grantee: Islip Town, NY

Grant: B-11-MN-36-0102

LOCCS Authorized Amount:	\$ 1,429,561.00
Grant Award Amount:	\$ 1,429,561.00
Status:	Reviewed and Approved
Estimated PI/RL Funds:	\$ 200,000.00
Total Budget:	\$ 1,629,561.00

Funding Sources

Funding Source	Funding Type
Neighborhood Stabilization Program Three	Do not select this item.

Narratives

Summary of Distribution and Uses of NSP Funds:

The CDA estimates that the available funds will be sufficient to purchase 14 homes (10 for CDA and 4 for Habitat for Humanity) within the targeted area. In addition, the CDA currently owns five (5) eligible vacant homes within the targeted area, which are in various stages of renovation, using CDBG, HOME, and NSP1 funding. NSP3 funds will also be utilized in the partial renovation of these five (5) currently owned homes. It should be also noted that, the Community Development Corporation of Long Island and Long Island Housing Partnership each currently has one home under renovation within the area under using NSP1 funding. Our current estimate is that 19 homes will be assisted with NSP3 funding. Furthermore, the CDA anticipates acquiring at least two or three additional properties each year over the next few years, depending upon funding levels and market conditions.

The above project description is hereby amended to read as follows:

The CDA will use the available funds towards the purchase of four (4) short sale properties, three of which will be demolished and replaced with new affordable homes (LMMH). The fourth property will be transferred to Habitat for Humanity of Suffolk, Inc., for rehabilitation and sale to an eligible low income family (LH25).

In addition, three (3) vacant and blighted homes which had already been in the possession of the CDA at the initiation of the NSP3 Program will be demolished and replaced with new affordable homes. Two will be for sold to families meeting the LMMH thresholds, and one will be sold to a family meeting the LH25 threshold.

In total, seven (7) homes will be completed under the NSP3 Program, five (5) under activity one (LMMH) and two (2) under activity two (LH25).

How Fund Use Addresses Market Conditions:

The Federal Government through the U.S. Department of Housing and Urban Development has made it very clear that NSP3 funds are to be used in such a way as to make a focused impact in target communities. Their statistics indicate that while there have been in excess of 1.9 million foreclosures across the country in the past two years, only about 100,000 to 120,000 foreclosures will be able to be assisted with NSP funds from all three rounds of the program. This is only about 5 or 6 percent of the nationwide problem. In order to make a visible difference in communities through the use of NSP3 funding, HUD has established a goal that municipalities attempt to select small enough areas, in which approximately 20% of the foreclosed (REO) homes can be addressed.

Suffolk County, and the Town of Islip, in particular, has been especially hard hit by the foreclosure crisis. RealtyTrak data reported by Newsday on July 15, 2010, indicates that Suffolk County has the highest foreclosure rate in all of New York State. Newsday also reported (May 7, 2010) that one-half of all of the high-cost mortgages on Long Island were in trouble. Two zip codes in the Town of Islip, Brentwood and Central Islip, were in the top five on long in terms of the number of nonprime distressed mortgages per 1,000 housing units.

The Town of Islip Community Development Agency (CDA) has been compiling and analyzing data supplied by Long Island



Profiles regarding lis pendens and foreclosures for the past few years. Lis pendens are the documents that are filed by lenders against homeowners who have fallen into arrears in their mortgages. While many homeowners are able to come current on payments or sell their homes prior to foreclosure, the number of lis pendens filed is a window into the future in terms of neighborhood instability. Prior to 2008, there were less than 1,400 lis pendens filed in the Town each year, and less than 250 foreclosures. Since 2008, there have been over 2,000 lis pendens filed each year, and the cases that have resulted in foreclosures have more than doubled. While we do not have the actual number of homes that completed the foreclosure process for 2010, we have data indicating that approximately 110 were advertised for sale on the steps of Town Hall each month.

For the purposes of its original Neighborhood Stabilization Program application (NSP1), the Town selected three zip codes to target - the hamlets of Bay Shore, Brentwood and Central Islip. Our data indicates that these three areas alone make up about 70 percent of all of the lis pendens in the town, and over 80 percent of the completed foreclosures. All of these neighborhoods have high NSP3 Scores according to the HUD supplied data. This new NSP funding, in the amount of \$1,429,561, however, is not nearly sufficient to make an appreciable impact in all three neighborhoods simultaneously. It cannot even make an appreciable impact in one whole neighborhood. It was decided that all funds must go into just one highly targeted area.

In order to craft a highly targeted program, the Town has established goals for the NSP3 which are consistent with its Consolidated Plan and the original NSP application. These goals are: (1) To decrease the number of dilapidated and vacant units; (2) to increase the level of homeownership; and (3) to stabilize the population and price. Our tools for accomplishing this are to establish a grantee-driven homeownership program for foreclosed homes which have been acquired and renovated or reconstructed by the CDA or a non-profit partner. Lease-purchase will also be available for otherwise eligible purchasers who lack only a down payment.

In order to determine which area to target, CDA staff looked at the three hardest hit portions of each of the NSP1 communities. We evaluated the data for the Sunnysbrook area in Bay Shore, Regis Park in Brentwood, and the northern portion of Lowell Avenue in Central Islip. The Sunnysbrook area was eliminated due to the fact that too few properties were available for purchase, its NSP3 Score was lower than the other two areas, it had fewer high cost mortgages, and it had a much lower loan delinquency rate. The Regis Park area was a very close second in need to the North Lowell area. Its income is lower than North Lowell, but it had slightly lower high-cost mortgages, slightly lower delinquency and foreclosure rates, and 60% fewer vacant properties according to the USPS data. While these two areas have not been selected to receive this extremely targeted NSP3 funding, all current CDA and Town programs will continue address the identified needs in these areas. The North Lowell Target Area has a NSP3 Score of 20, which is the highest possible. It contains 989 housing units, and no commercial or industrial property. It is very close to the Central Islip train station, and has Suffolk County Transit bus service along its westerly and northern borders. TRF Policy Map data does not indicate any brownfield or superfund sites within the area, and there are no multifamily housing, public housing or tax credit properties either. 56.29% of the families have incomes below 80% of the Nassau-Suffolk median, and 83.95% have incomes below 120% of median. There were 738 mortgages originated in the area between 2004 and 2007, 47.34% of which were high-cost. 20.38% of the mortgagees were 90 days or more delinquent or in foreclosure. While house values have declined significantly throughout the nation and the Town of Islip, we suspect that the FHA's estimate of a 14.6% decline in house values is more of a regional number. Based upon the prices for houses which the CDA has acquired in the target area over the last two years, we feel that the cumulative decrease in house values is closer to 50%.

A January 2011 windshield survey by the Central Islip Civic Council identified 75 homes within the target area which appear to be vacant. Many of these homes are for sale by individuals or banks, and make up a substantial portion of 461 foreclosed homes that RealtyTrac says are currently on the market within the Central Islip zip code. Like HUD, RealtyTrac categorizes the target area as having the highest ratio of foreclosure actions to housing units.

A map of the North Lowell Target Area is included in Appendix 2 to this document along with the HUD generated NSP3 Planning Data. HUD estimates that at least 19 properties will need to be improved in order to make a visible impact.

The CDA estimates that the available funds will be sufficient to purchase 14 homes (10 for CDA and 4 for Habitat for Humanity) within the targeted area. In addition, the CDA currently owns five (5) eligible vacant homes within the targeted area, which are in various stages of renovation, using CDBG, HOME, and NSP1 funding. NSP3 funds will also be utilized in the partial renovation of these five (5) currently owned homes. It should be also noted that, the Community Development Corporation of Long Island and Long Island Housing Partnership each currently has one home under renovation within the area under using NSP1 funding. Our current estimate is that 19 homes will be assisted with NSP3 funding. Furthermore, the CDA anticipates acquiring at least two or three additional properties each year over the next few years, depending upon funding levels and market conditions.

In summary, we feel that we have the right strategy, and that the North Lowell Target Area is the right size, for us to make an appreciable impact given the time frame and available funding.

Ensuring Continued Affordability:

The requirement for "Continued Affordability" in the context of homeownership units under the Neighborhood Stabilization Program appears to refer more to the initial purchaser of an assisted home, rather than in the subsequent purchasers of the home, but the Town of Islip proposes to address both the initial and subsequent purchasers in accordance with 24 CFR 92.254 and as follows:

Continued affordability will be maintained for the initial purchasers due to our requirement that only fixed interest rate mortgages will be used, and due to the provision of soft second and third subsidy mortgages, as necessary, to ensure that the purchasers will not have to pay more than 40% of their incomes (Back-End Ratio) toward principal, interest, taxes and insurance and all other debt. All purchasers will also be required to complete eight hours of homebuyer counseling, dealing with the financial, credit, and legal aspects of acquiring and maintaining a home. In addition, banks who provide financing for the program must agree to comply with the "bank regulators" guidance for non-traditional mortgages," as stipulated in the HUD Notice.

Affordability can never be 100% guaranteed in an ownership situation, because there are always circumstances beyond the control of the purchaser and the municipality. These include the possibility of rapidly increasing utility costs, and increases in school or other property taxes. They also include the possibility of changes in incomes or expenses of the purchasers, due to job changes or losses, adding new household members, or college and medical expenses. Our program design will control the fixed costs, while variable costs will have to be borne by the purchasers, as with all homeowners whether government assisted or not.

Insofar as continued affordability to subsequent purchasers of the homes is concerned, there will not be an absolute requirement for affordability to a target income group. Rather, we will make all soft subsidy mortgages in excess of \$40,000 permanent, and

payable upon sale or other transfer of the property. If allowed by the regulations and appropriate at the time of sale, the CDA will consider transferring the NSP3 soft second or third mortgage to a subsequent purchaser within the target income range. If, on the other hand, it is determined that all subsidies must be returned to the Treasury at the time of re-sale, the homes will be re-sold regardless of the income of the subsequent purchasers. It should be noted, however, that due to the modest income nature of the target area, and the higher income levels allowed for participation in the NSP, it is likely that subsequent sales will be to families earning less than 120% of MFI regardless of subsidy repayment or transferability. In short, the unit will either remain permanently affordable, or all but a maximum of \$40,000 in federal subsidy mortgages will be repaid at the time of the sale to an ineligible family.

Definition of Blighted Structure:

The State of New York has a definition of "Unsafe Structures and Equipment" under Section 107 of the Fire Code of New York State:

"An unsafe structure is one that is found to be dangerous to the life, health, property or safety of the public or to the occupants of the structure by not providing minimum safeguards to protect or warn occupants in the event of fire; or because such structure contains unsafe equipment or is so damaged, decayed, dilapidated, or structurally unsafe; or is of such faulty construction or unstable foundation that partial or complete collapse is possible."

"Unsafe equipment includes any boiler, heating equipment, elevator, moving stairway, electrical wiring or device, flammable liquid containers or other equipment on the premises or within the structure that is in such disrepair or condition that the equipment is a hazard to life, health, property or safety of the public or occupants of the premises or structure. "The Town of Islip proposes to use the New York State definition of "Unsafe Structures and Equipment" as our definition of a "blighted structure." It should be noted, however, that many structures have deferred maintenance and defects of a substantial nature, but that would not yet be considered "unsafe." While such less blighted structures would probably not be candidates for demolition, we will be looking for foreclosed homes requiring this level of rehabilitation for inclusion in our program.

Definition of Affordable Rents:

The Town of Islip is not currently proposing to provide rental housing under the NSP3 program due to the high level of absentee ownership of dilapidated rental homes prevailing in the target community and contributing to its decline. As is noted in the description for Activity 1, however, we are leaving the possibility of leasing the houses we renovate for a limited period of time in the event that we are not able to attract a sufficient number of qualified purchasers through our marketing and lottery. In addition, otherwise qualified purchasers, who lack sufficient down payments, may be offered our Rent With Option to Buy Contract.

In the event that any houses are to be rented, rather than sold, we will follow an affirmative marketing plan and include outreach to potential applicants who are unlikely to be reached through typical advertising.

The Town of Islip proposes to use various levels of HOME Program Rents as our definition of "Affordable Rents."

For projects designed for renters with incomes below 50% of the Nassau-Suffolk MSA Median Family Income, we will use the "Low HOME Rent Limit;" for projects designed for renters with incomes between 50% and 80% of median income, we will use the "High HOME Rent Limit" and for families between 80% and 120% of median income, we will use the "Fair Market Rent." In addition, if a unit has project based rental assistance associated with it, we will allow the "Fair Market Rent" to be used, regardless of the income of the tenant. This is because the Section Eight program rules insure that the tenant does not have to pay more than 30% of his or her income toward housing costs.

While no absolute guarantee can be made regarding the ultimate long term affordability of rental units without the provision of a continual subsidy, such as a public housing or Section Eight program, use of the HOME Program Rents assures that the units remain reasonably affordable to a wide selection of potential tenants within the target income ranges, and that all tenants of the targeted low income units will have incomes below 50% of median.

Housing Rehabilitation/New Construction Standards:

All houses rehabilitated under the Neighborhood Stabilization Program will: (1) meet Housing Quality Standards; (2) meet the New York State Uniform Fire Prevention and Building Code; and (3) conform to the Town of Islip Community Development Agency Master Specifications which have been developed for all of our HUD funded rehabilitation programs. In addition, efforts will be made to replace all appliances and fixtures with Energy Star labeled units, and, all units which undergo gut rehabilitation or reconstruction (the vast majority) will be built to new housing Energy Star standards. Green building materials will be specified wherever practicable. Houses will also be tested for lead based paint and abated, as necessary, in accordance with current CDBG regulations.

Vicinity Hiring:

The size of the Lowell Avenue North Target Area is very small (part of one Census Tract) and contains no commercial properties. As a result, it is unlikely that we will be able to find many contractors in the immediate neighborhood, unless they work out of their houses. Nevertheless, we will make a strong effort to solicit contractors from the target area and surrounding community through advertising and outreach to community groups. We will also require that if the contractors need to hire anyone, they provide us with a plan and documentation of their efforts to recruit from within the target area.

Procedures for Preferences for Affordable Rental Dev.:

The Town of Islip is not currently proposing to provide rental housing under the NSP3 program due to the high level of absentee ownership of dilapidated rental homes prevailing in the target community and contributing to its decline. As is noted in the description for Activity 1, however, we are leaving the possibility of leasing the houses we renovate for a limited period of time in the event that we are not able to attract a sufficient number of qualified purchasers through our marketing and lottery. In addition, otherwise qualified purchasers, who lack sufficient down payments, may be offered our Rent With Option to Buy Contract.

In the event that any houses are to be rented, rather than sold, we will follow an affirmative marketing plan and include outreach to potential applicants who are unlikely to be reached through typical advertising.

Grantee Contact Information:

NSP3 Program Administrator Contact Information

Name (Last, First)

Fink, Paul (Executive Director)

Email Address

pfink@islipcda.org

Phone Number

631-665-1185 ext. 18

Mailing Address

Town of Islip Community Development Agency

15 Shore Lane

PO Box 5587

Bay Shore, NY 11706

Project Summary

Project #	Project Title	Grantee Activity #	Activity Title
1	Affordable Housing - Financing	1	Affordable Housing for First Time Homebuyers
		2	Affordable Housing - Habitat For Humanity
2	Administration and Planning	3	Administration and Planning
9999	Restricted Balance	<i>No activities in this project</i>	



Activities

Project # / Title: 1 / Affordable Housing - Financing Mechanisms

Grantee Activity Number: 1
Activity Title: Affordable Housing for First Time Homebuyers

Activity Type:

Rehabilitation/reconstruction of residential structures

Project Number:

1

Projected Start Date:

07/01/2011

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

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

Environmental Assessment:

COMPLETED

Benefit Report Type:

Direct (Households)

Activity Status:

Completed

Project Title:

Affordable Housing - Financing

Projected End Date:

06/30/2014

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 1,079,214.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 1,079,214.00

Proposed Beneficiaries

	Total	Low	Mod	Low/Mod%
# Owner Households	5		5	100.00
# of Households	5		5	100.00

Proposed Accomplishments

	Total
# of Singlefamily Units	5
# of Housing Units	5
# of Substantially Rehabilitated Units	5
#Units deconstructed	5
#Sites re-used	5
#Dishwashers replaced	5
#Refrigerators replaced	5
#Light fixtures (outdoors) replaced	10
#Light Fixtures (indoors) replaced	20
#Replaced hot water heaters	5



#Replaced thermostats	5
#Additional Attic/Roof Insulation	5
#Energy Star Replacement Windows	50
# of Properties	5

Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

Town of Islip Community Development Agency

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
Town of Islip Community Development Agency	Unknown	\$ 1,079,214.00

Location Description:

Lowell Avenue North Target Area.

Activity Description:

This project will entail the acquisition and rehabilitation or reconstruction of eligible properties within the target community for rental or sale to families earning between 50% and 80% of median income. This will serve our goals to decrease the number of dilapidated and vacant units in the target area, to increase the levels of homeownership, and to help to stabilize the population and property values.

CDA staff will carefully inspect each house to determine the scope of required renovations, and an architectural firm will be hired to prepare the plans. Private contractors will bid to perform the renovation work. Purchasers will be selected through a lottery, and will be given one or two mortgages to assist in the purchase. The first mortgage will be at 5% interest over 30 years, and the second mortgage (if needed) will be a non-interest bearing non-payment mortgage that will only become due upon transfer of the property. The amount of the second mortgage will be calculated so as to insure that the principal, interest, taxes and insurance (PITI) do not exceed 33% of the purchaser's income. This will help to ensure continued affordability.

All purchasers will also be required to complete eight hours of homebuyer counseling, dealing with the financial, credit, and legal aspects of acquiring and maintaining a home.

It is the Town's intention to sell all of the houses to first time homebuyers. If, however, the market falters to the point that there are an insufficient number of interested purchasers, it may be necessary to rent the homes to income qualified families until the market improves and the backlog of houses for sale in the communities is greatly reduced.

This activity is not designed to meet the low income housing requirement for those below 50% of area median income.

The size of the Lowell Avenue North Target Area is very small (part of one Census Tract) and contains no commercial properties. As a result, it is unlikely that we will be able to find many contractors in the immediate neighborhood, unless they work out of their houses. Nevertheless, we will make a strong effort to solicit contractors from the target area and surrounding community through advertising and outreach to community groups. We will also require that if the contractors need to hire anyone, they provide us with a plan and documentation of their efforts to recruit from within the target area.

The acquisition for this activity is not expected to result in any displacement or relocation. If, for any reason, it is determined that the Uniform Relocation Act applies to an acquisition, all notice and payment requirements of the URA will be followed.

Grantee Activity Number: 2
Activity Title: Affordable Housing - Habitat For Humanity

Activity Type:

Rehabilitation/reconstruction of residential structures

Project Number:

1

Projected Start Date:

07/01/2011

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

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

Environmental Assessment:

COMPLETED

Benefit Report Type:

Direct (Households)

Activity Status:

Completed

Project Title:

Affordable Housing - Financing

Projected End Date:

06/30/2014

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 407,391.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 407,391.00

Proposed Beneficiaries

	Total	Low	Mod	Low/Mod%
# Owner Households	2	2		100.00
# of Households	2	2		100.00

Proposed Accomplishments

	Total
# of Singlefamily Units	2
# of Housing Units	2
# of Substantially Rehabilitated Units	2
# ELI Households (0-30% AMI)	
#Units deconstructed	2
#Sites re-used	2
#Dishwashers replaced	2
#Refrigerators replaced	2
#Light fixtures (outdoors) replaced	4
#Light Fixtures (indoors) replaced	8
#Replaced hot water heaters	2
#Replaced thermostats	2
#Additional Attic/Roof Insulation	2
#Energy Star Replacement Windows	20
# of Properties	2



Activity is being carried out by Grantee:

No

Activity is being carried out through:**Organization carrying out Activity:**

Habitat For Humanity of Suffolk

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
Habitat For Humanity of Suffolk	Non-Profit	\$ 175,000.00
Town of Islip CDA	Local Government	\$ 237,271.79

Location Description:

Lowell Avenue North Target Area.

Activity Description:

Please note that the activity description is being modified as follows:

One home will be rehabilitated by Habitat for Humanity of Suffolk, Inc., and a second home will be reconstructed by the Town of Islip CDA. Both homes will be sold to eligible families earning less than 50% of median income.

(Other changes below are show in italics.)

This project will entail the acquisition and rehabilitation or reconstruction of eligible properties within the target community for rental or sale to families earning less than 50% of median income. This will serve our goals to decrease the number of dilapidated and vacant units in the target area, to increase the levels of homeownership, and to help to stabilize the population and property values.

Habitat for Humanity and/or Islip CDA staff will carefully inspect each house to determine the scope of required renovations, and a private architectural firm will prepare the renovation plans. Volunteers and/or private contractors will perform the work under the professional supervision of Habitat and/or CDA staff. Purchasers will be selected through a thorough outreach and screening process, and will be given at least two mortgages to assist in the purchase. The first mortgage will be at 0% interest over 20 to 30 years, and the second mortgage will be both non-interest bearing and non-payment, that will only become due upon transfer of the property. The amount of the second mortgage will be calculated so as to insure that the principal, interest, taxes and insurance (PITI) do not exceed 30% of the purchaser's income. This will help to ensure continued affordability. All purchasers will also be required to complete eight hours of homebuyer counseling, dealing with the financial, credit, and legal aspects of acquiring and maintaining a home.

This activity is designed to meet the low income housing requirement for those below 50% of area median income.

The size of the Lowell Avenue North Target Area is very small (part of one Census Tract) and contains no commercial properties. In addition, Habitat for Humanity performs the vast majority of the work themselves, without the need for private contractors. As a result, it is unlikely that they will need to hire private contractors. Nevertheless, we will ask them to make a strong effort to solicit contractors, if needed, from the target area and surrounding community through advertising and outreach to community groups. We will also require that if they, or any contractors they do use, need to hire anyone, they provide us with a plan and documentation of their efforts to recruit from within the target area.

The acquisition for this activity is not expected to result in any displacement or relocation. If, for any reason, it is determined that the Uniform Relocation Act applies to an acquisition, all notice and payment requirements of the URA will be followed.

Project # / Title: 2 / Administration and Planning

Grantee Activity Number: 3
Activity Title: Administration and Planning

Activity Type:

Administration

Project Number:

2

Projected Start Date:

07/01/2011

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

Not Applicable - (for Planning/Administration or Unprogrammed Funds only)

Environmental Assessment:

EXEMPT

Benefit Report Type:

NA

Activity Status:

Completed

Project Title:

Administration and Planning

Projected End Date:

06/30/2014

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 142,956.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 142,956.00

Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

Town of Islip Community Development Agency

Proposed budgets for organizations carrying out Activity:

Responsible Organization

Town of Islip Community Development Agency

Organization Type

Unknown

Proposed Budget

\$ 142,956.00

Location Description:

General program administration will be performed at the Agency's current location of: 15 Shore Lane, Bay Shore, NY 11706.



Activity Description:

General administration and planning relating to the implementation of the two other activities, plus reporting and monitoring.

Action Plan Comments:

- Reviewer - Action Plan approved with comment. Please confirm that Responsible Organization for Activity #2 should be Habitat for Humanity.
- Reviewer - AR- Grantee is encouraged to revise Activity 1 within the Activity is being carried out by Grantee cell response. Action is approved with comments made.
- Reviewer - Grantee has corrected text conversion mistakes (as advised), activated Number of Properties Link for Activity 1 and populated the Activity Location description cell for Activity 3. Allison Richards
- Reviewer - Amended Action Plan reflects revised assessment of projected accomplishments based on market conditions as discussed with CPD office.

Action Plan History

Version	Date
B-11-MN-36-0102 AP#1	10/24/2011
B-11-MN-36-0102 AP#2	04/30/2012
B-11-MN-36-0102 AP#3	10/30/2013
B-11-MN-36-0102 AP#4	10/27/2015
B-11-MN-36-0102 AP#5	10/28/2015
B-11-MN-36-0102 AP#6	10/27/2016
B-11-MN-36-0102 AP#7	04/28/2017

