

HUD-52860

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This general information is required to request HUD approval to remove public housing property (residential or non-residential) from public housing requirements, including use restrictions imposed under the Annual Contributions Contract (ACC) and the Declaration of Trust (DOT)/Declaration of Restrictive Covenants (DoRC). PHAs may request such HUD approval under the following laws: demolition and disposition (Section 18 of the 1937 Act and 24 CFR part 970); voluntary conversion (Section 22 of the 1937 Act and 24 CFR part 972); required conversion (Section 33 of the 1937 Act and 24 CFR part 972); homeownership (Section 33 of the 1937 Act and 24 CFR part 906); retentions under 2 CFR 200.311 (PIH Notice 2016-20 or subsequent notice); and eminent domain (PIH Notice 2012-8, or subsequent notice).

**Note:** This form requests general information only and PHAs are required to submit an additional addendum for the specific type of proposed removal. This form in addition to the applicable addendum are collectively known as the SAC application since these applications are processed by HUD's Special Applications Center (SAC). HUD will use this information to review PHA requests, as well as to track removals for other record keeping requirements. Responses to this collection of information are statutory and regulatory to obtain a benefit. The information requested does not lend itself to confidentiality. PHAs are required to submit this information electronically to HUD through the Inventory Removals Submodule of the Inventory Management System/PIH Information Center (IMS/PIC) system (or a later electronic system prescribed by HUD). IMS/PIC will assign each SAC application a "DDA" number.

This form does not apply to proposed removals (conversions) under HUD's Rental Assistance Demonstration (RAD) program; and the instructions for RAD application submissions via IMS/PIC is provided and governed by a separate OMB-approved HUD form.

Section 1: General Information	
1. Date of Application:	
2. Name of Public Housing Agency (PHA):	
3. PHA Identification Number:	
4. PHA Address:	
5. Contact Person Name at PHA:	
6. Contact Person Phone No.:	
7. Contact Person Email:	
8. Is the PHA operating under any remedial order, compliance agreement, final judgment, consent decree, settlement agreement or other court order or agreement, including but not limited to those related to a fair housing or other civil rights finding of noncompliance? <i>If yes, attach a narrative description of explaining how the proposed removal is consistent with such order, agreement or other document</i>	<input type="checkbox"/> Yes  <input type="checkbox"/> No

Section 2: N/A
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Section 3: PHA Plan, Board Resolution, Environmental Review and Local Government Consultation	
1. PHA Plan: Year of PHA Plan that includes the removal action and approval date:	Year:      Approval Date:
<i>Attach evidence that the removal action is included in the approved PHA Plan and approval date</i>	
2. Board Resolution that approves the removal action; and PHA's submission of removal application to HUD: Board Resolution Number:      Board Resolution Date:	
<i>Attach a copy of signed PHA Board Resolution</i>	

<b>3. Environmental Review:</b> Check the box for the entity that conducted the Environmental Review (ER):	<input type="checkbox"/> HUD under 24 CFR part 50 <input type="checkbox"/> Responsible Entity (RE) under 24 CFR part 58 Name of RE: The City of Minneapolis Date ER was conducted: 2/7/2019
Attach a copy of HUD's approval of the Environmental Review (i.e. HUD-7015.16). See instructions.	
<b>4. Local Government Consultation:</b> The PHA covers the following jurisdiction(s):	
<b>5. Date(s) of letter(s) of support from (local) government officials:</b>	
Attach copies of all letters of support from local government officials, along with a narrative description of the PHA's consultation (if applicable)	

Section 4: Description of Existing Development				
1. Name of Development:				
2. Development Number:				
3. Date of Full Availability (DOFA):				
4. Number of Residential Buildings:				
5. Number of Non-Residential Buildings:				
6. Date Constructed:				
7. Is the Development Scattered Site?				<input type="checkbox"/> Yes <input type="checkbox"/> No
8. Number of Buildings (single family, duplexes, 3-plexes, 4-plexes, other):				
9. Number of Types of Structures (row houses, walk-up units, high-rise unit):				
10. Total Acres in Development:				
11. Existing Unit Distribution	General Occupancy	Elderly/Disabled Designated Units	Total Units Being Used for Non-Dwelling Purposes	Total Units in Development
0 – Bedroom				
1 – Bedroom				
2 – Bedrooms				
3 – Bedrooms				
4 - + Bedrooms				
Total				
Attach a description of the distribution of UFAS accessible units (bedroom size; unit type, e.g., mobility or sensory)				

Section 5: Description of Proposed Removal						
<b>1. Type of Removal Action(s)</b> (e.g., Demolition, Disposition, Disposition to allow for Public Housing Mixed-Finance Modernization, Demolition and Disposition, DeMinimis Exception under Demolition, Voluntary Conversion, Required Conversion, Homeownership, Eminent Domain, Retention under 2 CFR part 200)						
<b>2. Proposed Action by Unit Type (e.g. bedroom size)</b>						
Existing Unit Distribution	General Occupancy	Elderly/Disabled Designated Units	UFAS Mobility Units	UFAS Sensory Units	Total Units Being Used for Non-Dwelling Purposes	Total Units in Development
0 – Bedroom						
1 – Bedroom						
2 – Bedrooms						
3 – Bedrooms						
4 - + Bedrooms						
Total						

<b>3. Proposed Action by Building Type</b>	Buildings to be Demolished Only	Buildings to be Disposed of Only
Residential Buildings		
Non-Residential Buildings		
Total Buildings		
<i>If the removal action is for only a portion of property at a contiguous site, attach a site map</i>		
<b>4. Total Acreage Proposed for Removal (if applicable)</b>		
(a) Attach a description of the land (e.g. survey, copy of the legal description)		
(b) Attach a copy of the recorded Declaration of Trust (DOT)/Deed of Restrictive Covenant (DoRC)		
(c) If the removal action is for only a portion of property at a contiguous site, attach a site map.		
<b>5. Estimated Value of the Proposed Property</b>	\$	
(a) Was an independent appraisal conducted to determine the estimated Fair Market Value?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
(b) If yes, date of appraisal and name of appraiser:	Date:	Name:
(c) If not, describe other form of valuation used:		
<i>Attach an executive summary of the appraisal or other form of valuation</i>		
<b>6. Timetable</b>		
Activity		Estimated Number of Days After HUD Approval:
(a)Begin Relocation of Residents:	N/A <input type="checkbox"/> -if vacant or for non-dwelling building	
(b)Complete Relocation of Residents:	N/A <input type="checkbox"/> -if vacant or for non-dwelling building	
(c) Execute Contract for Removal		
(d) Removal of the property		

<b>Section 6: Relocation</b>		
<b>1.</b> Number of Units Proposed for Removal that are Occupied as of the Submission Date of this SAC application: (Note: These numbers are not editable and automatically populated when application is submitted)		
<b>2.</b> Number of individual residents that the PHA estimates will be displaced by this removal action:		
<i>Attach a summary of the number of individual residents estimated to be displaced by race and national origin and a summary of households estimated by be displaced by who have a member who is a person with a disability</i>		
<b>3.</b> Who will provide relocation counseling and advisory services to residents?	<input type="checkbox"/> PHA staff <input type="checkbox"/> Another Entity contracted by the PHA Describe:	
<i>Attach a description of the relocation counseling and advisory services that the will be provided to residents who will be displaced by this action</i>		
<b>4.</b> What is the estimated costs of relocation and moving expenses (including advisory services)?		\$
<b>5.</b> What is the anticipated source of funds for relocation and moving expenses (including advisory services)?	<input type="checkbox"/> Capital Funds <input type="checkbox"/> Operating Funds <input type="checkbox"/> Funding Source Year: 2019 <input type="checkbox"/> Non-1937 Act Funds (describe: )	
<b>6.</b> What comparable housing resources does the PHA expect to offer to displaced residents?	<input type="checkbox"/> Public Housing. If checked, number: <input type="checkbox"/> Section 8 HCV (existing resources. If checked, number: <input type="checkbox"/> Section 8 HCV (new award of TPVs) (see question #7). If checked, number: <input type="checkbox"/> PBV Unit. If checked, number: 736 <input type="checkbox"/> Other (attach description). If checked, number:	
<i>Attach a summary of the comparable housing resources that the PHA expects to offer to be displaced residents.</i>		

Section 7: Resident Consultation	
1. Will any residents be displaced or otherwise affected by the proposed removal action? If yes, date(s) PHA consulted with residents?	<input type="checkbox"/> Yes <input type="checkbox"/> No Date(s): February 2, 2019, February 7, 2019 February 12, 2019
Attach a narrative description of consultation process, along with supporting documentation (e.g., agenda, meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)	
2. Is there a Resident Council (at affected development)? If yes, name of Resident Council and dates PHA consulted it:	<input type="checkbox"/> Yes <input type="checkbox"/> No Name: _____ Date(s): _____ <input type="checkbox"/> N/A to removal action
Attach a narrative description of consultation process, along with supporting documentation e.g. meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)	
3. Is there a Resident Council (PHA-wide jurisdiction)? If yes, name of Resident Council and dates PHA consulted it:	<input type="checkbox"/> Yes <input type="checkbox"/> No Name: _____ Date(s): _____ <input type="checkbox"/> N/A to removal action
Attach a narrative description of consultation process, along with supporting documentation e.g. meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)	
4. Date(s) PHA consulted with the Resident Advisory Board (RAB) (as defined in 24 CFR 903.13)	Name of RAB: MPHA Resident Advisory Date(s): Board, January 23, 2019 <input type="checkbox"/> N/A to removal action
Attach a narrative description of consultation process, along with supporting documentation e.g. meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)	
5. Did the PHA receive any written comments from residents or resident groups/organizations during the consultation process?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, attach comments received, along with an evaluation by the PHA	

## Section 9: PHA Certification of Compliance

*Acting on behalf of the Board of Commissioners of the PHA, as its Chairman, Executive Director, or other authorized PHA official, I approve the submission of this SAC Application known as DDA # \_\_\_\_\_ for removing public housing property from public housing use restriction, of which this document is a part, and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of this SAC application and the implementation thereof:*

1. All information contained in this SAC application (including all supporting documentation, attachments and required form HUD-52860 addendums) is true and correct as of today's date.
2. Resident demographic data in the IMS/PIC system is updated and current as of the date of the submission of this SAC application.
3. The PHA will comply with all applicable fair housing and other civil rights requirements, including but not limited to HUD's general non-discrimination and equal opportunity requirements listed at 24 CFR 5.105(a), as well as the duty to affirmatively further fair housing (AFFH) related to this SAC application. AFFH includes ensuring that the proposed inventory removal development is not in conflict with fair housing goals and strategies in my agency's PHA or MTW Plan, and is consistent with my agency's obligation to AFFH, certification and supporting activities. The PHA conducted the submission requirements of this SAC application (including removal justification; resident consultation, etc.) in conformity with Title

VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act of 1990, state or local accessibility requirements, and other applicable civil rights laws. If HUD approves this SAC application, the PHA will carry out and implement this removal action (including relocation, if applicable), in conformity with all applicable civil rights requirements. The requirements for AFFH can be found at 24 CFR §§ 5.150-5.152, 5.154, 5.156, 5.158, 5.160, 5.162, 5.164, 5.166, 5.168, and 5.169-5.180.

4. The removal action proposed in this SAC application does not violate any remedial civil rights order or agreements, conciliation agreements, voluntary compliance agreements, final judgments, consent decrees, settlement agreements or other court orders or agreements to which the PHA is a party. If the PHA is operating under such a document, it must indicate this by uploading a document to the SAC application that provides a citation to the document and explains how the proposed demolition or disposition is consistent with such document.
5. If the PHA is a non-qualified PHA under the Housing and Economic Recovery Act of 2008 (HERA), it has complied with the PHA Plan requirements regarding the proposed removal action at 24 CFR part 903 and the applicable statutory removal authority. For instance, if the removal action is a demolition or disposition, the PHA must describe the demolition or disposition in its PHA Plan or in a Significant Amendment to that PHA Plan and that description must be substantially identical to the description in the SAC application. If the PHA is a qualified PHA, the PHA certifies that it has discussed the removal action at a public hearing.
6. The PHA has conducted all applicable resident consultation and will conduct all relocation activities associated with this SAC application in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 CFR 8.6) and with 49 CFR 24.5, and as applicable, the Americans with Disabilities Act of 1990. The PHA will take reasonable steps to ensure meaningful access to their programs and activities for persons who have limited ability to read, speak, or understand English – i.e., individuals who have limited English proficiency (LEP).
7. The PHA will comply with all applicable Federal statutory and regulatory requirements and other HUD requirements, including applicable PIH Notices, in carrying out the implementation this SAC application, as approved by HUD. The PHA specifically certifies that the property proposed for removal in this SAC application is in compliance with Declaration of Trust (DOT) or Declaration of Restrictive Covenants (DoRC) requirements.
8. The PHA will comply with the terms and conditions of any HUD approval that HUD may issue for this SAC application, including requirements applicable to future use, record-keeping and reporting; and will specifically retain records of the SAC application and its implementing actions of HUD's approval of this SAC application for a period of not less than 3 years following the last required action of HUD's approval. The PHA further certifies that it will make such records available for inspection by HUD, the General Accountability Office and the HUD Office of Inspector General. If the PHA wants to make any material changes from what it described in its SAC application and/or HUD's approval of the SAC application, it will request HUD approval for such changes, in accordance with applicable HUD guidance.
9. The PHA will not take any action to remove or otherwise operate the property proposed for removal outside of public housing requirements until it receives written approval of this SAC application from HUD.
10. If any units proposed for removal by this SAC application are subject to an Energy Performance Contracting (EPC), the PHA agrees to comply with additional instructions provided by HUD regarding the EPC and will not take any steps to implement this SAC application (if approved by HUD), without receiving confirmation from HUD that all applicable EPC requirements are satisfied.
11. If any units proposed for removal by this SAC application are subject to a Capital Fund Financing Plan (CFFP) or other Section 30 debt, the PHA agrees to comply with additional instructions provided by HUD regarding the CFFP or other Section 30 and will not take any steps to implement this application (if approved by HUD), without receiving confirmation from HUD that all applicable CFFP or other Section 30 requirements are satisfied.
12. If the PHA is in the process of removing all of its public housing units from its ACC low-rent inventory through this or other SAC applications and/or other pending removal actions, including the Rental Assistance Demonstration (RAD) program, the PHA agrees to comply with additional instructions provided by HUD regarding the close-out of its public housing portfolio.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	
Official Title:	
Signature:	
Date:	

**Form HUD-52860 Instructions**

This form request general information from PHAs about proposed removal actions under the following laws: demolition and disposition (Section 18 of the 1937 Act and 24 CFR part 970); voluntary conversion (Section 22 of the 1937 Act and 24 CFR part 972); required conversion (Section 33 of the 1937 Act and 24 CFR part 972); homeownership (Section 32 of the 1937 Act and 24 CFR part 906); retentions (PIH Notice 2016-20 and 24 CFR 200.311); and eminent domain (PIH Notice 2012-8, or replacement notice). This form is the first part of a SAC application that must be submitted via the fields in the Inventory Removal Submodule of IMS/PIC (or replacement system).

PHAs must complete the sections of this form where there is no field in the IMS/PIC SAC application for the requested information. PHAs must then upload this form and other supporting documentation requested by this form to the IMS/PIC SAC application. PHAs must label that supporting documentation by section number of this form and/or by name (e.g. Resident Consultation). PHAs must complete and submit applicable addendums as indicated below as part of a SAC application. PHAs must refer to the applicable regulations, PIH notices and other program guidance noted above for detailed requirements on the submissions required for the specific removal action proposed in the SAC application at SAC web site.

<b>Proposed Removal Action</b>	<b>Additional HUD Form Required</b>
Section 18 Disposition and/or Demolition	HUD-52860-A
Section 18 Demolition Rehab Needs and Cost-Test	HUD-52860-B
Section 32 Homeownership	HUD-52860-C
Section 33 Required Conversion	HUD-52860-D
Section 22 Voluntary Conversion	HUD-52860-E
Eminent Domain	HUD-52860-F
Part 200 Retention	HUD-52860-G

NOTE: The removal of public housing units from the PHA's inventory through these actions will impact (decrease) the PHA's Operating and Capital Fund subsidy from HUD. See 24 CFR 990.190 and PIH Notice 2017-22 (or successor notice) for impacts on Operating Fund. Capital Funds for units will terminate at the time the units are removed from ACC via IMS/PIC. However, PHAs may be eligible for Demolition Disposition Transition Funding (DDTF) pursuant to 24 CFR 905.400(j).

### **Section 1: General Information**

Some fields will automatically populate from IMS/PIC. If not, complete all fields.

### **Section 2: N/A**

### **Section 3: PHA Plan, PHA Board Resolution, Environmental Review and Local Government Consultation**

Refer to the regulation, PIH Notice or other HUD guidance document for guidance on these requirements for the specific removal action proposed, but generally the following apply:

PHA Plan: PHAs must include the removal action in their approved PHA plan for all SAC applications.

Board Resolution: PHAs must obtain a board resolution approving the removal action for all SAC applications. For demolitions and dispositions proposed under 24 CFR part 970, the board resolution must be dated after the date of resident and local government consultation.

Environmental Clearance: HUD will not process or approve a SAC application without evidence that the proposed removal action has received Environmental Clearance. This evidence will generally be a copy of a HUD signed Authority to Use Grant Funds (HUD-7015.16 form or subsequent form) for the proposed removal action (including future use, if known) to evidence an environmental review acceptable to HUD was completed under 24 CFR part 58. In some instances, evidence of Environmental Clearance may be a letter from the Responsibly Entity stating the activity was exempt or categorically excluded under 24 CFR part 58. The only exception to obtaining Environmental Clearance under 24 CFR part 58 is if HUD, in its sole discretion, decides to complete the environmental review itself under 24 CFR part 50. In this case, the applicable local HUD Office of Public Housing must have actually completed the environmental review and determined the action has Environmental Clearance before HUD will process or approve a SAC application.

Local Government Consultation: PHAs must consult with their local government officials and obtain a letter of support for all SAC applications (except for eminent domain and homeownership). For demolitions and dispositions proposed under 24 CFR part 970, PHAs must include a narrative description of its consultation with local government officials.

## **Sections 4-9 must be completed and submitted separately for each Development covered by this Application**

### **Section 4: Description of Existing Development(s)**

Most information should automatically populate from IMS/PIC information, except for Section 4, Line item 10 (Total Acres of the Development) which the **PHA must complete**. If line 10 is not completed or less than proposed for disposition under Section 5, PHA will not be able to fill in Section 5, line 4. The development number should be the HUD development number. All development numbers are at least 8 characters long (and may be up to 11 characters for AMP developments).

### **Section 5: Description of Proposed Removal**

Unlike section 4, this information will not automatically populate. PHAs must complete the fields of this form where there is no field in the IMS/PIC SAC application for the requested information (i.e. UFAS information).

**Removal Action Type:** PHAs must select removal action type as the first step to creating the electronic SAC application in IMS/PIC.  
**Property description (Unit, Building, Acreage):** PHAs identify the property by development number(s) and buildings by their IMS/PIC building PHAs provide the total acreage (refer to instructions for Section 4, line 10) and physical address of the property proposed for removal. If the removal action includes land (i.e., not just buildings), PHAs should attach a description of the land (e.g. survey, copy of the legal description), along with a copy of the DOT/DoRC that is recorded against the property, if available. If the proposed removal action (including demolition) is for only a portion of the property at a contiguous site, PHAs must attach a site map.

**Estimated Value of Property:** Attach an independent appraiser's appraisal summary or other valuation method.

**Timetable:** PHAs indicates the number of days after HUD approval of a SAC application that they estimate they will complete these activities.

### **Section 6: Relocation**

PHAs complete this section for all proposed removal action where relocation will be required. PHAs may be required to complete additional relocation information in the applicable addendums (e.g. right of first refusal for homeownership applications; evidence of compliance with all applicable federal, state, and local laws for eminent domain actions).

For question #3, the summary of the type of counseling and advisory services should include a description of how the services will promote fair housing, including but not limited to how they will assist residents in obtaining housing in opportunity areas.

For question #6, the relocation summary should provide sufficient detail about the comparable housing that the PHA will offer to the displaced residents (i.e. based on available resources and resident preferences) Indicate how the PHA will identify and offer comparable housing to (a) displaced residents who have a family member who is a person with a disability; and (b) displaced residents who are not eligible for Section 8 HCV assistance (e.g. because they are over-income).

Note that a PHA's eligibility to receive TPVs is based on statutory Appropriations laws, and other HUD guidance, including but not limited to PIH Notice 2017-10 and PIH Notice 2018-04 (or any successor or replacement notices).

If the PHA is a public housing only-PHA and will partnering with a PHA that administers an HCV program for the TPVs, the partnering PHA must have jurisdictional authority and administrative capacity to administer the TPVs. PHAs should contact their local HUD Office of Public Housing for more information.

### **Section 7: Resident Consultation**

Refer to the regulation, PIH Notice or other HUD guidance document for guidance on resident consultation for the specific removal action proposed.

### **Section 8: N/A**

### **Section 9: PHA Certification of Compliance**

The Executive Director, Board Chairperson, or other authorized agent of the PHA, should complete, sign and date the Certification and submit it (as a scanned PDF file) as part of its submission of the SAC application.

## De Minimis Demolition

PHAs do not need HUD approval to demolish units under Section 18 de minimis authority. PHAs do need to submit information to HUD described at 970.7(a)(1), (2), (12), (13), and (15), which includes PHA plan, description of the property, board resolution, and environmental requirements. Thus, for purposes of de minimis demolitions, PHAs are submitting information and not a SAC application through this form.



## **Application**

### **Section 2, Line 2**

#### **Scattered Sites Section 18 Justification for Disposition**

Minneapolis Public Housing Authority owns and operates 736 scattered site housing units in 648 properties spread over the 58.2 square miles of Minneapolis.

Of the 648 properties, 573 are single-family homes, 70 are duplexes, three are four-plexes, one is a five-unit row-house, one is a six-unit building, and one property is made up of eight units - three duplexes and two single family homes. The five-unit row-house, the six-unit building, and eight-unit property are included in this Section 18 disposition application. These three properties do not qualify as scattered sites for purposes of Notice PIH 2018-04 unless HUD is willing to disregard the language limiting “scattered sites” to no more than four contiguous units. The properties, however, are similar to the rest of MPHA’s scattered sites portfolio in that they have unmet capital needs, lack uniformity of systems, and have operational inefficiencies due to being spread across the city.

The scattered site properties represent a variety of heating and cooling technologies, architectural styles, and construction techniques. 230 of the 648 properties were constructed prior to World War II. The average age of the properties is 71 years.

**Figure 1: Images of different scattered sites representing the variety of building types and eras of construction**



Year built: 1990



1954



1902



1968



1924



1905

#### **Capital Shortfall**

In 2014 MPHA worked with the Inspections Group and Ameresco to complete an extrapolated sample physical needs assessment of the scattered site portfolio. The 736 units in the portfolio were sorted into groupings based on similarities including year built, stories, size, and building type. Ten percent of the portfolio was audited to include representative properties from each of the groupings. The capital needs for the audited properties were extrapolated to each property in that grouping based on assumptions related to building systems, materials, construction types, and finishes. Life cycle estimates were developed utilizing Fannie Mae Estimated Useful Life tables and replacement costs were established around RS Means standards for this geographical area, as well as the professional judgment of these two industry leaders. The replacement costs are adjusted annually to reflect price escalation.

The scattered site portfolio has an estimated \$28 million in unmet capital needs in 2018. This includes repairs and replacements that have been identified by the Inspections Group and Ameresco for replacement in 2018 or in previous years. Over the next five years there is an additional \$16 million in estimated capital needs.

The cost to address both the backlog of capital needs and anticipated future needs is substantially greater than the vastly insufficient Public Housing Capital Fund can cover. Simply addressing the capital needs of our scattered site portfolio would consume 100 percent of MPHA's expected capital fund allocation for the next five years- not leaving any capital funding for the 5,000+ housing units in the 42 high-rise buildings and 184 low-rise units owned and operated by MPHA, which also have \$110 million in unmet capital needs. If MPHA dedicated a pro rata share of its capital grant to scattered sites based on the number of units relative to all MPHA-owned units, approximately \$1.8 million of its 2018 grant would be dedicated to capital improvements at these properties. Even at the historically high appropriations levels of 2018, this would only address 6% of the current unmet need.

#### Operational challenges

The 736 units are spread across 58.2 square miles of Minneapolis. The distance needed to travel between units leads to lost employee time. Sixty-five percent of the scattered sites are four or more miles from the property management office as the crow flies. However, the driving distance between the office and many of the scattered sites is over eight miles. The lack of uniformity in the systems across these properties makes them challenging to operate as well. Additionally, each has unique capital needs that differ from property to property, making it costly to reach any economies of scale.

MPHA is committed to our mission to promote and deliver quality, well-managed housing to a diverse, low-income population across Minneapolis; many of these units are in relatively low-poverty opportunity areas. Moreover, their preservation is particularly important because apart from the 184-unit low-rise development, they constitute Minneapolis' only public housing principally for non-elderly families.

#### Need for and likely success of preservation

While the continuation of the scattered sites as public housing is unsustainable for the reasons discussed, the proposed disposition to a nonprofit owned and operated by the MPHA, along with continued operation under the project-based voucher platform will provide a higher and more reliable subsidy stream. As a result, MPHA will be able to preserve these units for the low-income families we serve. A Use Restriction/Agreement of 30 years will be applied to the properties, thus continuing the affordability of the units for at least the next 30 years. The properties will continue to provide homes to families with similar income levels as those housed there today.

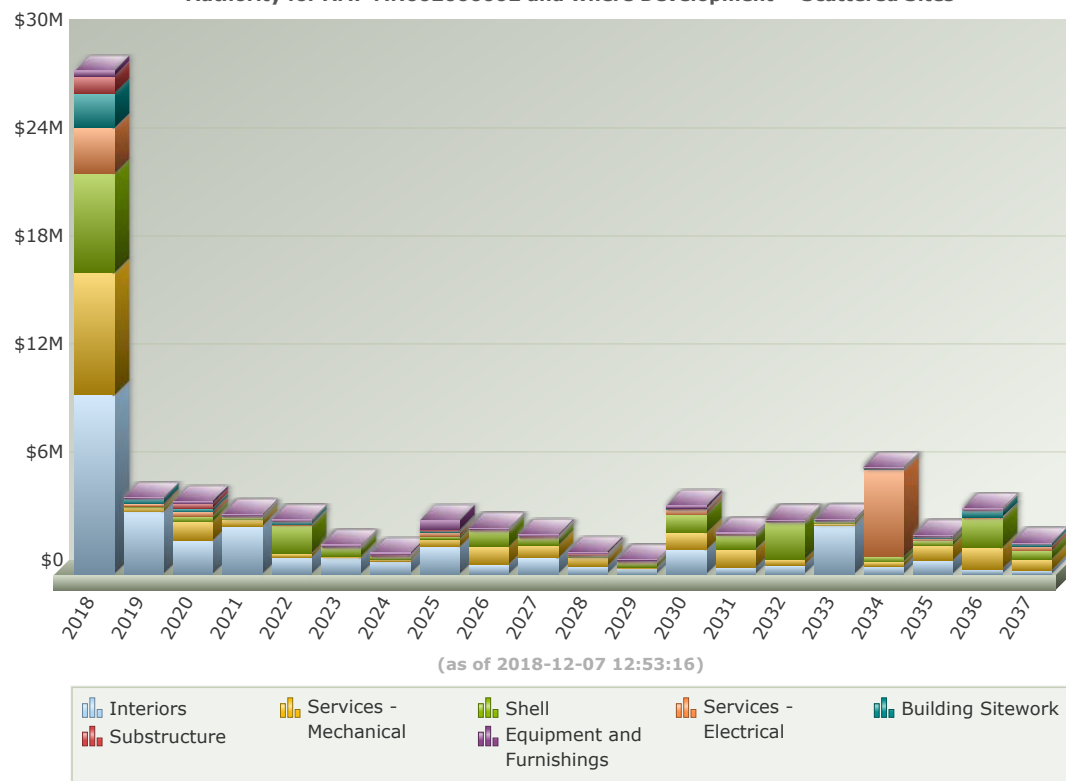


## MINNEAPOLIS PUBLIC HOUSING AUTHORITY



### Cost by Discipline

Years 2018 - 2037 and where Facility Status = Active for Portfolio Minneapolis Public Housing Authority for AMP MN002000002 and where Development = Scattered Sites

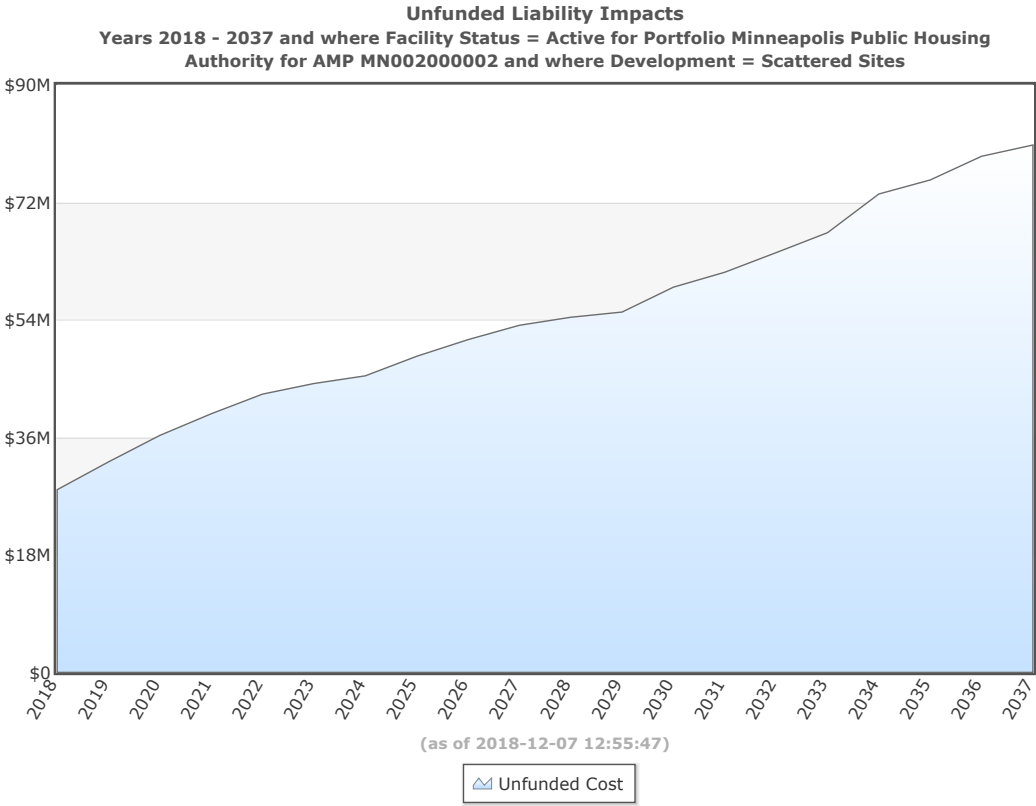


### Cost by Discipline Years 2018 - 2037 and where Facility Status = Active for Portfolio Minneapolis Public Housing Authority for AMP MN002000002 and where Development = Scattered Sites

Discipline	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
Interiors	\$9,962,736	\$3,454,249	\$1,880,723	\$2,651,924	\$931,708	\$896,858	\$712,011	\$1,538,608	\$522,793	\$901,210	\$442,254	\$312,198	\$1,346,005	\$381,437	\$496,961	\$2,700,517	\$439,555	\$774,208	\$279,378	\$211,049
Services - Mechanical	\$6,771,245	\$239,928	\$1,034,344	\$368,240	\$211,055	\$100,359	\$125,423	\$410,527	\$1,026,729	\$707,105	\$497,434	\$80,526	\$945,202	\$1,006,035	\$324,095	\$86,499	\$246,383	\$821,679	\$1,200,387	\$606,309
Shell	\$5,533,644	\$89,884	\$292,144	\$120,671	\$1,583,770	\$511,803	\$165,542	\$155,743	\$899,721	\$451,044	\$117,002	\$288,469	\$1,008,940	\$775,985	\$2,115,776	\$171,229	\$294,179	\$252,311	\$1,661,725	\$492,524
Services - Electrical	\$2,528,989	\$118,007	\$256,558	\$73,118	\$19,120	\$7,755	\$16,447	\$222,505	\$4,958	\$9,092	\$10,882	\$17,055	\$306,082	\$72,044	\$28,459	\$27,996	\$4,849,352	\$134,365	\$3,681	\$244,923
Building Sitework	\$1,927,544	\$333,863	\$190,194	\$34,325	\$240,711	\$69,979	\$58,767	\$116,004	\$78,642	\$50,541	\$35,091	\$60,459	\$39,798	\$4,118	\$19,226	\$30,876	\$70,756	\$127,867	\$441,034	\$164,751
Substructure	\$947,617	\$0	\$264,087	\$22,158	\$10,806	\$16,509	\$8,798	\$21,239	\$11,626	\$9,772	\$23,143	\$22,592	\$24,881	\$15,574	\$7,949	\$0	\$9,775	\$29,483	\$8,366	\$0
Equipment and Furnishings	\$299,642	\$24,596	\$142,114	\$40,494	\$13,656	\$17,360	\$89,305	\$527,718	\$4,937	\$71,123	\$100,641	\$19,549	\$139,598	\$31,123	\$8,149	\$34,970	\$19,913	\$7,663	\$32,550	\$6,165



MINNEAPOLIS PUBLIC HOUSING AUTHORITY



Unfunded Liability Impacts Years 2018 - 2037 and where Facility Status = Active for Portfolio Minneapolis Public Housing Authority for AMP MN002000002 and where Development = Scattered Sites																				
Year	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
Cost	\$27,971,416	\$4,260,527	\$4,060,163	\$3,310,931	\$3,010,826	\$1,620,623	\$1,176,293	\$2,992,343	\$2,549,406	\$2,199,887	\$1,226,446	\$800,846	\$3,810,505	\$2,286,315	\$3,000,615	\$3,052,086	\$5,929,913	\$2,147,576	\$3,627,120	\$1,725,721
Unfunded Cost	\$27,971,416	\$32,231,942	\$36,292,105	\$39,603,036	\$42,613,862	\$44,234,485	\$45,410,779	\$48,403,122	\$50,952,528	\$53,152,415	\$54,378,861	\$55,179,707	\$58,990,213	\$61,276,528	\$64,277,143	\$67,329,228	\$73,259,141	\$75,406,717	\$79,033,837	\$80,759,558

**Application**  
**Section 4, Line 3**  
**MTW Annual Plan excerpts**

**Preserving and Stabilizing MPHA Scattered Sites through “Section 18”**

MPHA owns approximately 730 “scattered site” homes across most parts of Minneapolis. These single-family homes (and a handful of duplexes and four-unit properties) provide essential housing to 80 percent of the low-income families with children served by MPHA. They offer a unique opportunity for families in public housing to integrate seamlessly into their surrounding neighborhoods, and often serve as a training ground for future homeownership. The distance between the sites, varied building types and systems, and other challenges with efficiency and effectiveness make it difficult to manage and sustain these units under the current public housing subsidy. The long-term trend of underfunding for public



*An MPHA scattered-site home*

housing operations and maintenance is unlikely to reverse. Many of these older homes will also require more work in coming years than the vastly insufficient Public Housing Capital Fund can cover.

*HUD’s Section 18 and Tenant Protection Vouchers could assure continued housing for the families we serve and an increased, stable source of funding to support the scattered site homes.*

Accordingly, MPHA will explore whether an application under HUD’s Section 18 provisions could **place the scattered sites on a stable financial footing, without relocation or any day-to-day change for residents** who live there now. This application would require consultation with residents and MPHA board approval. No third party is involved. In recent guidance, HUD explicitly indicated scattered site housing as an example of housing it “generally approves” under Section 18 in the best interests of residents, and as consistent with the mission of HUD and the PHA.

Under HUD’s Section 18 process, MPHA would transfer ownership (HUD calls this process “disposition”) of the scattered sites (AMP 2) to a non-profit established and fully controlled by MPHA. This

necessary step would allow MPHA to apply for Section 8 Tenant Protection Vouchers (TPVs) which would provide a higher level of funding for each family than under the current public housing structure. Residents may agree to project-base TPVs in the scattered site units they occupy. Where families choose to use the TPV as a tenant-based voucher, MPHA would use its additional capacity to project-base vouchers in the scattered sites as needed, under our existing MTW authority.

MPHA could not proceed without receipt of TPVs, which assure continued housing for the families we serve and an increased, stable source of funding to support the scattered site homes going forward. A HUD Section 18 transfer of the properties as described here would also allow MPHA to access other sources of capital in the future for major repairs and renovations to these houses (something we cannot do under the current structure). In rare cases, the



*MPHA scattered sites can provide a stepping-stone to home-ownership, as they did for the Vang family.*

physical condition of a scattered site property may be such that it is unsustainable in the near-term even under the increased subsidy. In these cases—which MPHA will identify as we explore our HUD Section

18 application—MPHA would seek HUD approval for other outcomes that would allow us to serve the same or more families (for example, by rebuilding a fourplex where a single-family home once stood). Families in these homes would receive TPVs and full relocation benefits, to which they are entitled by law. If they choose, we would accommodate them elsewhere within our scattered site portfolio.

**Application**

**Section 3, Line 2**

**Board Resolution**

**To be Inserted**

**Application**  
**Section 3, Line 3**  
**Environmental Review**

Per HUD, the Minneapolis Public Housing Authority's (MPHA) scattered site project MN002000002 is categorically exempt per Section 58.34(a)(12).

See attached.





U.S. Department of Housing and Urban  
Development  
451 Seventh Street, SW  
Washington, DC 20410  
[www.hud.gov](http://www.hud.gov)  
[espanol.hud.gov](http://espanol.hud.gov)

**Environmental Review for Activity/Project that is  
Categorically Excluded Subject to Section 58.5  
Pursuant to 24 CFR 58.35(a)**

**Project Information**

**Project Name:** MPHA-Scattered-Site-Section-18-Disposition

**HEROS Number:** 900000010006448

**State / Local Identifier:**

**Project Location:** 1001 Washington Ave N, Minneapolis, MN 55401

**Additional Location Information:**

Public housing authority scattered site single family housing sites subject to this disposition action are located throughout the city of Minneapolis. The above address is the headquarters location of the public housing authority

**Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:**

The Minneapolis Public Housing Authority (MPHA) is preparing a Section 18 Disposition Application to HUD for its scattered site single family housing stock. The environmental undertaking is the disposition of MPHA's scattered site housing units, roughly 736 units in 647 buildings from the ownership of the public housing authority to a non-profit that is MPHA-owned and -controlled, an action of real estate action that involves no physical impacts to the environment. The intended use of the single family housing properties would not be changed under this undertaking. The project's outcome would be turning the properties into project based vouchers and increasing the future operational subsidy available for the properties. In future years, these single family properties in and of themselves would be subject to Part 58 environmental reviews for applicable work as identified and would be considered a separate undertaking. The single family housing stock is located throughout the city of Minneapolis and consists of structures of 1-4 units either as single detached structures or townhome structures.

**Level of Environment Review Determination:**

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:

58.34(a)(12)

58.35(a)(5)

**Funding Information**

Grant Number	HUD Program	Program Name
Section 18 -2019 MPHA	Public Housing	Other Public Housing Program

Estimated Total HUD Funded Amount: \$1.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$1.00

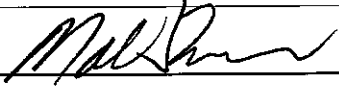
**Mitigation Measures and Conditions [CFR 1505.2(c)]:**

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

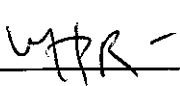
Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Complete
---------------------------	---------------------------------	--------------------------------	----------

**Determination:**

<input checked="" type="checkbox"/>	This categorically excluded activity/project converts to <b>EXEMPT</b> per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; <b>Funds may be committed and drawn down after certification of this part</b> for this (now) EXEMPT project; OR
<input type="checkbox"/>	This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, <b>publish NOI/RROF and obtain "Authority to Use Grant Funds"</b> (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
<input type="checkbox"/>	This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature:  Date: 2/6/19

Name / Title/ Organization: Matt Bower / / MINNEAPOLIS

Responsible Entity Agency Official Signature:  Date: 2/7/19

Name/ Title: Nuria Rivera-Vandermyle City Coordinator

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

**Application**  
**Section 3, Line 4**  
**Local Government Consultation**

MPHA senior staff held briefings with key elected Minneapolis officials to achieve understanding and comfort with MPHA's application under Section 18. In October 2018, MPHA's Director of Policy & External Affairs met with a housing policy aide for Minneapolis Mayor Jacob Frey for a briefing solely devoted to this topic. MPHA described the nature and mechanics of a conversion under Section 18, including how this application fits within MPHA's broader housing preservation strategy and mission. During the conversation, the aide confirmed details around resident protections, the proposed transfer to an MPHA-controlled nonprofit, and clarified MPHA's intent to preserve and improve MPHA's scattered sites. The aide did not raise any specific concerns. He provided a briefing to the mayor and conveyed MPHA's offer to meet directly with the mayor on the topic. The aide communicated back to MPHA that the mayor's office considered the initial briefing sufficient, did not have any concerns, and would draft a letter of support (included with this application).

In December 2018, MPHA's Executive Director met with the President of the Minneapolis City Council. The meeting covered multiple topics, at her request, but was scheduled by MPHA as a briefing on our Section 18 application. The City Council President received the briefing and materials, and stated she was satisfied with the information and MPHA's intent to apply. MPHA asked if she would be willing to join the mayor's letter of support, and she agreed.

Also in December 2018, MPHA's Executive Director provided a Section 18 briefing to the chair of the Minneapolis City Council Housing Policy and Development Committee. In the course of the conversation, the council member asked for additional explanation about the structure of MPHA's public nonprofit entity, asked about the nature of the financing that might be available to MPHA after conversion, and confirmed the protections for scattered site residents.

During 2018, MPHA spoke in many one-on-one meetings with members of the Minneapolis City Council about the Section 18 program and the agency's intention to apply for the scattered sites. Our anticipated use of Section 18 featured prominently in our 2018 MTW Annual Plan, a copy of which was sent to each member of the council. Finally, MPHA's Deputy Executive Director presented on MPHA's Strategic Vision and Capital Plan to the council's Housing Policy and Development Committee in June 2018, including slides devoted to Section 18.

**Application**  
**Section 3, Line 5**  
**AGO Letter**

Memo to the Section 18 Special Applications Center (SAC)

Per Section 3, Line 4 of the Application, MPHA has consulted with local elected officials at the City of Minneapolis. Attached is a letter for support signed by the Mayor and City Council President of the City of Minneapolis.

To the Special Applications Center of the U.S. Department of Housing and Urban Development:

We are writing to offer support for this application of the Minneapolis Public Housing Authority under Section 18 of the United States Housing Act.

We are undertaking a historic push in Minneapolis to create and preserve affordable housing, amid a crisis that is most severe for the lowest-income families in our community. Preserving our city's existing affordable housing—especially deeply affordable housing for people below 30 percent of area median income—is a central pillar of our housing agenda. We are glad to lend our support to MPHA's application under Section 18's disposition rules to stabilize and preserve these deeply affordable homes that are otherwise unsustainable.

MPHA's scattered site houses across the city provide homes to more than 700 low-income families for whom the private housing market otherwise has little to offer. For working families, a house with affordable rent provides a stable base for employment and economic opportunity. Almost all have young children, for whom a permanent home—perhaps the first many have known—provides a brighter future. MPHA's scattered sites are integrated invisibly into neighborhoods around the city, with many in low-poverty areas.

Yet as valuable as these houses are to our housing continuum, current federal operating subsidy and capital funding—combined with the inherently varied, dispersed nature of these houses—puts them at great risk of becoming uninhabitable in the coming years. The average age of these homes is 71 years old. While the vast majority could serve families for decades with the right investment in maintenance and repairs, Congressional funding falls far short of these needs. MPHA's scattered sites need a change in approach if they are to continue providing safe and stable homes to the families they serve today.

Our understanding is that under a successful Section 18 disposition, MPHA will transfer the properties to a public nonprofit controlled by MPHA. This change will allow MPHA to secure a subsidy suitable to maintain the units, allow the flexibility to invest in their long-term capital needs, and provide an accountable oversight structure to assure they remain homes for extremely low-income families in Minneapolis long into the future. We expect that the transition for current families will be largely seamless, that they will remain in their homes, and this process will keep this deeply affordable housing stable and viable into the future. The City Council and MPHA are working to enter in to a MOU that, among other things, will ensure current tenants are not displaced from MPHA housing.

Thank you for your consideration and prompt approval of this application.

Best regards,



Jacob Frey

Mayor of Minneapolis



Lisa Bender

Minneapolis City Council President

**Application**  
**Section 4, Line 4, 8 and 9**  
**Description of Units**

Minneapolis Public Housing Authority (MPHA) has a total of 736 scattered site properties under a DOT that are included in this application. The attached spreadsheet breaks down the 736 properties by:

- Unit Address
- PIC Unit ID
- Legal Desc\_ Addition Name
- Legal Desc\_ Lot
- Legal Desc\_ Block
- Legal Desc\_ Metes and Bounds Description
- Lot area
- Units in Building
- Building Type
- Units Bedroom Count
- Assessed Property value by property
- Year Built
- Year Acquired
- Notes

In summary:

- 648 Buildings consisting of 736 units
- Bedroom mix breakdown:
  - 131 two bedrooms
  - 348 three bedrooms
  - 205 four bedrooms
  - 43 five bedrooms
  - 9 six bedrooms

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,654	1	Single Family	3	\$155,500.	1957	1967
Withheld	Withheld	Withheld	Withheld	7,000	1	Single Family	3	\$140,500.	1924	1967
Withheld	Withheld	Withheld	Withheld	7,990	2	Side/Side Duplex	3	\$187,500.	1980	1959
Withheld	Withheld	Withheld	Withheld	6,550	1	Single Family	4	\$182,500.	1982	1967
Withheld	Withheld	Withheld	Withheld	5,891	1	Single Family	4	\$144,500.	1984	1984
Withheld	Withheld	Withheld	Withheld	5,325	1	Single Family	5	\$135,000.	1969	1973
Withheld	Withheld	Withheld	Withheld	7,990	2	Side/Side Duplex	3	\$187,500.	1980	1959
Withheld	Withheld	Withheld	Withheld	5,325	1	Single Family	4	\$106,500.	1969	1973
Withheld	Withheld	Withheld	Withheld	5,479	2	Side/Side Duplex	2	\$269,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,334	1	Single Family	4	\$120,000.	1922	1967
Withheld	Withheld	Withheld	Withheld	5,479	2	Side/Side Duplex	2	\$269,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,376	1	Single Family	5	\$173,500.	1969	1973
Withheld	Withheld	Withheld	Withheld	10,800	2	Side/Side Duplex	2	\$308,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	10,800	2	Side/Side Duplex	2	\$308,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,953	2	Side/Side Duplex	2	\$159,000.	1980	1959
Withheld	Withheld	Withheld	Withheld	5,953	2	Side/Side Duplex	2	\$159,000.	1980	1959
Withheld	Withheld	Withheld	Withheld	5,274	1	Single Family	4	\$238,500.	1909	1973
Withheld	Withheld	Withheld	Withheld	3,774	1	Single Family	3	\$281,000.	1920	1980
Withheld	Withheld	Withheld	Withheld	5,936	1	Single Family	3	\$146,500.	1919	1967
Withheld	Withheld	Withheld	Withheld	7,938	2	Side/Side Duplex	3	\$203,500.	1980	1958
Withheld	Withheld	Withheld	Withheld	7,938	2	Side/Side Duplex	3	\$203,500.	1980	1958
Withheld	Withheld	Withheld	Withheld	8,250	1	Single Family	4	\$179,500.	1909	1967
Withheld	Withheld	Withheld	Withheld	5,354	1	Single Family	4	\$106,000.	1969	1973
Withheld	Withheld	Withheld	Withheld	10,646	1	Single Family	5	\$177,500.	1910	1967
Withheld	Withheld	Withheld	Withheld	5,345	1	Single Family	3	\$156,500.	1912	1967
Withheld	Withheld	Withheld	Withheld	5,348	1	Single Family	3	\$137,500.	1914	1967
Withheld	Withheld	Withheld	Withheld	5,500	1	Single Family	5	\$170,000.	1980	1959
Withheld	Withheld	Withheld	Withheld	5,350	1	Single Family	4	\$153,000.	1904	1967
Withheld	Withheld	Withheld	Withheld	5,670	2	Side/Side Duplex	5	\$184,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	7,207	1	Single Family	6	\$239,000.	1929	1967
Withheld	Withheld	Withheld	Withheld	5,670	2	Side/Side Duplex	4	\$184,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	5,773	1	Single Family	2	\$121,000.	1918	1967
Withheld	Withheld	Withheld	Withheld	4,965	1	Single Family	5	\$164,500.	1970	1973
Withheld	Withheld	Withheld	Withheld	5,344	1	Single Family	3	\$98,000.	1969	1973
Withheld	Withheld	Withheld	Withheld	7,614	1	Single Family	4	\$171,500.	1909	1967
Withheld	Withheld	Withheld	Withheld	4,965	1	Single Family	3	\$85,000.	1969	1973
Withheld	Withheld	Withheld	Withheld	7,725	1	Single Family	4	\$202,500.	1930	1967
Withheld	Withheld	Withheld	Withheld	8,096	1	Single Family	3	\$168,500.	1927	1967
Withheld	Withheld	Withheld	Withheld	4,910	1	Single Family	3	\$109,500.	1910	1967
Withheld	Withheld	Withheld	Withheld	6,908	1	Single Family	4	\$125,500.	1980	1960
Withheld	Withheld	Withheld	Withheld	6,314	1	Single Family	4	\$168,500.	1980	1960
Withheld	Withheld	Withheld	Withheld	7,372	2	Side/Side Duplex	4	\$187,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	5,600	1	Single Family	5	\$159,500.	1980	1959
Withheld	Withheld	Withheld	Withheld	7,372	2	Side/Side Duplex	5	\$187,000.	1968	1969

**Application**

**Section 4, Line 4, 8, and 9**

**Description of Units**

**List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	8,635	1	Single Family	3	\$110,000.	1969	1973
Withheld	Withheld	Withheld	Withheld	5,401	1	Single Family	3	\$159,500.	1924	1967
Withheld	Withheld	Withheld	Withheld	7,725	1	Single Family	4	\$117,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	5,923	1	Single Family	4	\$188,500.	1927	1967
Withheld	Withheld	Withheld	Withheld	10,150	2	Side/Side Duplex	5	\$185,500.	1968	1969
Withheld	Withheld	Withheld	Withheld	10,150	2	Side/Side Duplex	4	\$185,500.	1968	1969
Withheld	Withheld	Withheld	Withheld	5,376	1	Single Family	4	\$114,000.	1914	1967
Withheld	Withheld	Withheld	Withheld	5,418	1	Single Family	3	\$147,500.	1913	1973
Withheld	Withheld	Withheld	Withheld	5,055	1	Single Family	3	\$127,500.	1946	1967
Withheld	Withheld	Withheld	Withheld	5,152	1	Single Family	3	\$125,500.	1924	1967
Withheld	Withheld	Withheld	Withheld	5,376	1	Single Family	3	\$109,500.	1921	1967
Withheld	Withheld	Withheld	Withheld	5,775	1	Single Family	3	\$125,500.	1938	1967
Withheld	Withheld	Withheld	Withheld	5,775	1	Single Family	3	\$177,000.	1924	1967
Withheld	Withheld	Withheld	Withheld	4,371	1	Single Family	6	\$166,500.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,144	1	Single Family	3	\$111,500.	1916	1967
Withheld	Withheld	Withheld	Withheld	8,601	2	Side/Side Duplex	3	\$172,500.	1980	1958
Withheld	Withheld	Withheld	Withheld	7,281	1	Single Family	4	\$142,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	8,601	2	Side/Side Duplex	3	\$172,500.	1980	1958
Withheld	Withheld	Withheld	Withheld	5,676	1	Single Family	6			1967
Withheld	Withheld	Withheld	Withheld	2,805	1	Single Family	3	\$208,500.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	5	\$217,000.	1986	1995
Withheld	Withheld	Withheld	Withheld	5,842	1	Single Family	3	\$262,000.	1955	2000
Withheld	Withheld	Withheld	Withheld	5,500	1	Single Family	3	\$138,000.	1911	1967
Withheld	Withheld	Withheld	Withheld	6,750	1	Single Family	3	\$97,500.	1970	1973
Withheld	Withheld	Withheld	Withheld	5,090	1	Single Family	3	\$146,500.	1942	1967
Withheld	Withheld	Withheld	Withheld	7,281	1	Single Family	5	\$167,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	7,280	1	Single Family	3	\$130,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	7,260	1	Single Family	2	\$191,500.	1900	2000
Withheld	Withheld	Withheld	Withheld	5,164	1	Single Family	4	\$283,000.	1900	1973
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	4	\$134,500.	1917	1967
Withheld	Withheld	Withheld	Withheld	5,018	1	Single Family	5	\$123,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,018	1	Single Family	4	\$109,500.	1914	1967
Withheld	Withheld	Withheld	Withheld	5,875	1	Single Family	4	\$146,500.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,018	1	Single Family	4	\$115,500.	1928	1967
Withheld	Withheld	Withheld	Withheld	7,281	1	Single Family	5	\$122,000.	1969	1973
Withheld	Withheld	Withheld	Withheld	5,720	1	Single Family	4	\$185,000.	1900	1960
Withheld	Withheld	Withheld	Withheld	7,150	1	Single Family	4	\$191,000.	1980	1960
Withheld	Withheld	Withheld	Withheld	3,412	1	Single Family	3	\$139,500.	1913	1967
Withheld	Withheld	Withheld	Withheld	5,026	1	Single Family	4	\$254,500.	1990	1991
Withheld	Withheld	Withheld	Withheld	5,360	1	Single Family	3	\$212,500.	1988	2000
Withheld	Withheld	Withheld	Withheld	5,625	2	Side/Side Duplex	2	\$128,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,625	2	Side/Side Duplex	2	\$128,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	11,896	1	Single Family	4	\$148,000.	1916	1967
Withheld	Withheld	Withheld	Withheld	4,983	1	Single Family	4	\$176,500.	1921	1967



**Application**

**Section 4, Line 4, 8, and 9**

**Description of Units**

**List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,992	1	Single Family	4	\$122,500.	1927	1967
Withheld	Withheld	Withheld	Withheld	5,992	1	Single Family	4	\$127,000.	1928	1967
Withheld	Withheld	Withheld	Withheld	5,580	1	Single Family	4	\$325,000.	2000	2000
Withheld	Withheld	Withheld	Withheld	5,992	1	Single Family	4	\$128,500.	1926	1967
Withheld	Withheld	Withheld	Withheld	5,194	1	Single Family	5	\$129,000.	1923	1973
Withheld	Withheld	Withheld	Withheld	5,194	1	Single Family	3	\$98,000.	1919	1967
Withheld	Withheld	Withheld	Withheld	5,457	1	Single Family	3	\$122,500.	1921	1967
Withheld	Withheld	Withheld	Withheld	5,392	1	Single Family	4	\$144,500.	1924	1967
Withheld	Withheld	Withheld	Withheld	4,974	1	Single Family	4	\$152,000.	1914	1967
Withheld	Withheld	Withheld	Withheld	5,040	1	Single Family	3	\$152,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,700	1	Single Family	4	\$129,000.	1920	1967
Withheld	Withheld	Withheld	Withheld	4,984	1	Single Family	4	\$130,500.	1911	1967
Withheld	Withheld	Withheld	Withheld	5,940	1	Single Family	4	\$235,000.	1912	1967
Withheld	Withheld	Withheld	Withheld	5,742	2	Side/Side Duplex	2	\$258,500.	1979	1959
Withheld	Withheld	Withheld	Withheld	5,742	2	Side/Side Duplex	2	\$258,500.	1979	1959
Withheld	Withheld	Withheld	Withheld	6,320	1	Single Family	2	\$88,500.	1922	1980
Withheld	Withheld	Withheld	Withheld	6,250	1	Single Family	3	\$247,500.	1974	1973
Withheld	Withheld	Withheld	Withheld	5,122	1	Single Family	3	\$165,500.	1920	1967
Withheld	Withheld	Withheld	Withheld	7,965	1	Single Family	3	\$222,500.	1954	1984
Withheld	Withheld	Withheld	Withheld	4,520	1	Single Family	4	\$217,500.	1907	1967
Withheld	Withheld	Withheld	Withheld	5,658	1	Single Family	3	\$109,000.	1969	1973
Withheld	Withheld	Withheld	Withheld	5,460	1	Single Family	3	\$137,000.	1925	1967
Withheld	Withheld	Withheld	Withheld	6,816	1	Single Family	6	\$156,500.	1916	1967
Withheld	Withheld	Withheld	Withheld	7,540	1	Single Family	5	\$232,500.	1914	1967
Withheld	Withheld	Withheld	Withheld	5,934	1	Single Family	3	\$99,500.	1954	1967
Withheld	Withheld	Withheld	Withheld	5,985	2	Side/Side Duplex	2	\$221,500.	1978	2000
Withheld	Withheld	Withheld	Withheld	5,985	2	Side/Side Duplex	2	\$221,500.	1978	2000
Withheld	Withheld	Withheld	Withheld	5,720	1	Single Family	4	\$165,000.	1980	1960
Withheld	Withheld	Withheld	Withheld	5,688	1	Single Family	3	\$121,000.	1911	1967
Withheld	Withheld	Withheld	Withheld	5,625	2	Side/Side Duplex	2	\$117,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	6,356	1	Single Family	4	\$139,500.	1938	1973
Withheld	Withheld	Withheld	Withheld	5,688	1	Single Family	3	\$129,000.	1909	1967
Withheld	Withheld	Withheld	Withheld	5,625	2	Side/Side Duplex	2	\$117,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,153	1	Single Family	4	\$149,500.	1926	1967
Withheld	Withheld	Withheld	Withheld	5,652	1	Single Family	4	\$125,500.	1928	1973
Withheld	Withheld	Withheld	Withheld	5,500	2	Side/Side Duplex	2	\$125,000.	1978	1980
Withheld	Withheld	Withheld	Withheld	5,500	2	Side/Side Duplex	2	\$125,000.	1978	1980
Withheld	Withheld	Withheld	Withheld	4,836	1	Single Family	4	\$289,000.	2000	2000
Withheld	Withheld	Withheld	Withheld	8,263	1	Single Family	4	\$140,000.	1970	1973
Withheld	Withheld	Withheld	Withheld	4,992	1	Single Family	4	\$102,500.	1980	1960
Withheld	Withheld	Withheld	Withheld	6,600	2	Side/Side Duplex	3	\$158,500.	1980	1959
Withheld	Withheld	Withheld	Withheld	6,600	2	Side/Side Duplex	3	\$158,500.	1980	1959
Withheld	Withheld	Withheld	Withheld	6,120	1	Single Family	4	\$216,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,842	1	Single Family	4	\$134,500.	1983	1984

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc	LEGAL_Desc	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in		Unit Bedroom		Assessed Property		Year Built	Year Acquired
	LOT	BLOCK			Building	Building Type	Count		Value			
Withheld	Withheld	Withheld	Withheld	10,525	1	Single Family	3		\$286,000.		1976	1980
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	4		\$223,500.		1972	1993
Withheld	Withheld	Withheld	Withheld	7,592	1	Single Family	3		\$304,500.		1976	1980
Withheld	Withheld	Withheld	Withheld	6,130	1	Single Family	4		\$286,000.		1971	1973
Withheld	Withheld	Withheld	Withheld	5,625	1	Single Family	4		\$129,500.		1983	1984
Withheld	Withheld	Withheld	Withheld	5,625	1	Single Family	3		\$105,500.		1983	1984
Withheld	Withheld	Withheld	Withheld	5,092	1	Single Family	4		\$128,000.		1916	1967
Withheld	Withheld	Withheld	Withheld	5,044	1	Single Family	3		\$157,000.		1964	1973
Withheld	Withheld	Withheld	Withheld	6,130	1	Single Family	5		\$265,000.		1903	1967
Withheld	Withheld	Withheld	Withheld	7,990	2	Side/Side Duplex	3		\$248,500.		1971	1972
Withheld	Withheld	Withheld	Withheld	7,990	2	Side/Side Duplex	3		\$248,500.		1971	1972
Withheld	Withheld	Withheld	Withheld	5,810	1	Single Family	4		\$288,000.		1971	1973
Withheld	Withheld	Withheld	Withheld	4,884	1	Single Family	4		\$144,000.		1984	1984
Withheld	Withheld	Withheld	Withheld	8,635	2	Side/Side Duplex	3		\$170,000.		1976	1980
Withheld	Withheld	Withheld	Withheld	8,635	2	Side/Side Duplex	3		\$170,000.		1976	1980
Withheld	Withheld	Withheld	Withheld	5,775	1	Single Family	4		\$118,000.		1971	1973
Withheld	Withheld	Withheld	Withheld	6,845	1	Single Family	5		\$315,500.		1923	1973
Withheld	Withheld	Withheld	Withheld	5,044	1	Single Family	3		\$270,000.		1976	1980
Withheld	Withheld	Withheld	Withheld	5,250	1	Single Family	3		\$89,000.		1971	1972
Withheld	Withheld	Withheld	Withheld	6,880	1	Single Family	3		\$225,500.		1910	1980
Withheld	Withheld	Withheld	Withheld	6,550	2	Side/Side Duplex	2		\$280,000.		1980	1958
Withheld	Withheld	Withheld	Withheld	6,550	2	Side/Side Duplex	2		\$280,000.		1980	1958
Withheld	Withheld	Withheld	Withheld	6,751	2	Side/Side Duplex	2		\$203,500.		1974	1973
Withheld	Withheld	Withheld	Withheld	6,751	2	Side/Side Duplex	2		\$203,500.		1974	1973
Withheld	Withheld	Withheld	Withheld	5,100	1	Single Family	3		\$123,000.		1921	1973
Withheld	Withheld	Withheld	Withheld	7,850	2	Side/Side Duplex	3		\$129,000.		1976	1980
Withheld	Withheld	Withheld	Withheld	7,850	2	Side/Side Duplex	3		\$129,000.		1976	1980
Withheld	Withheld	Withheld	Withheld	6,400	1	Single Family	4		\$145,000.		1983	1984
Withheld	Withheld	Withheld	Withheld	8,453	1	Single Family	4		\$162,000.		1971	1973
Withheld	Withheld	Withheld	Withheld	5,166	1	Single Family	4		\$277,500.		1952	1995
Withheld	Withheld	Withheld	Withheld	6,130	1	Single Family	3		\$246,500.		1922	1967
Withheld	Withheld	Withheld	Withheld	7,187	1	Single Family	4		\$140,000.		1942	1967
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	5		\$356,500.		1925	2000
Withheld	Withheld	Withheld	Withheld	3,276	1	Single Family	4		\$200,500.		1984	1984
Withheld	Withheld	Withheld	Withheld	6,030	2	Side/Side Duplex	3		\$416,000.		2005	2005
Withheld	Withheld	Withheld	Withheld	7,850	1	Single Family	5		\$96,500.		1972	1972
Withheld	Withheld	Withheld	Withheld	7,850	1	Single Family	4		\$103,000.		1971	1972
Withheld	Withheld	Withheld	Withheld	5,144	1	Single Family	4		\$122,000.		1920	1967
Withheld	Withheld	Withheld	Withheld	3,840	1	Single Family	2		\$156,500.		1928	1980
Withheld	Withheld	Withheld	Withheld	5,282	1	Single Family	3		\$129,500.		1970	1973
Withheld	Withheld	Withheld	Withheld	6,870	1	Single Family	4		\$170,000.		1971	1972
Withheld	Withheld	Withheld	Withheld	5,213	1	Single Family	4		\$173,500.		1971	1972
Withheld	Withheld	Withheld	Withheld	3,784	1	Single Family	3		\$159,500.		1916	1973
Withheld	Withheld	Withheld	Withheld	6,820	1	Single Family	3		\$291,000.		1900	2000

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	6,820	2	Side/Side Duplex	3	\$301,000.	1983	1984
Withheld	Withheld	Withheld	Withheld	6,820	2	Side/Side Duplex	3	\$301,000.	1983	1984
Withheld	Withheld	Withheld	Withheld	5,000	2	Side/Side Duplex	2	\$232,000.	1965	2000
Withheld	Withheld	Withheld	Withheld	5,000	2	Side/Side Duplex	2	\$232,000.	1965	2000
Withheld	Withheld	Withheld	Withheld	10,707	2	Side/Side Duplex	3	\$282,500.	1972	1972
Withheld	Withheld	Withheld	Withheld	5,213	1	Single Family	5	\$175,000.	1971	1972
Withheld	Withheld	Withheld	Withheld	10,707	2	Side/Side Duplex	3	\$282,500.	1972	1972
Withheld	Withheld	Withheld	Withheld	4,800	1	Single Family	3	\$295,000.	1976	1980
Withheld	Withheld	Withheld	Withheld	7,019	2	Side/Side Duplex	3	\$239,000.	1971	1972
Withheld	Withheld	Withheld	Withheld	7,019	2	Side/Side Duplex	3	\$239,000.	1971	1972
Withheld	Withheld	Withheld	Withheld	3,860	1	Single Family	4	\$266,500.	1910	1973
Withheld	Withheld	Withheld	Withheld	5,400	1	Single Family	4	\$167,000.	1971	1973
Withheld	Withheld	Withheld	Withheld	6,030	2	Side/Side Duplex	2	\$416,000.	2005	2005
Withheld	Withheld	Withheld	Withheld	5,220	1	Single Family	3	\$142,000.	1971	1972
Withheld	Withheld	Withheld	Withheld	5,153	1	Single Family	4	\$224,500.	1987	1993
Withheld	Withheld	Withheld	Withheld	6,751	1	Single Family	4	\$85,500.	1983	1984
Withheld	Withheld	Withheld	Withheld	4,625	1	Single Family	4	\$283,500.	1904	1967
Withheld	Withheld	Withheld	Withheld	5,732	1	Single Family	3	\$338,500.	1947	1973
Withheld	Withheld	Withheld	Withheld	5,510	2	Side/Side Duplex	2	\$115,000.	1977	1959
Withheld	Withheld	Withheld	Withheld	5,510	2	Side/Side Duplex	2	\$115,000.	1977	1959
Withheld	Withheld	Withheld	Withheld	4,693	1	Single Family	3	\$144,500.	1979	1959
Withheld	Withheld	Withheld	Withheld	6,992	1	Single Family	3	\$244,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,355	1	Single Family	4	\$146,500.	1971	1972
Withheld	Withheld	Withheld	Withheld	6,532	1	Single Family	4	\$197,500.	1971	1973
Withheld	Withheld	Withheld	Withheld	4,000	1	Single Family	4	\$246,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,355	1	Single Family	2	\$133,000.	1914	1967
Withheld	Withheld	Withheld	Withheld	6,240	1	Single Family	3	\$126,000.	1976	1980
Withheld	Withheld	Withheld	Withheld	5,282	1	Single Family	3	\$191,000.	1900	1972
Withheld	Withheld	Withheld	Withheld	4,776	1	Single Family	4	\$266,000.	1990	1991
Withheld	Withheld	Withheld	Withheld	5,052	1	Single Family	3	\$164,500.	1999	2000
Withheld	Withheld	Withheld	Withheld	3,902	1	Single Family	4	\$222,500.	1999	2000
Withheld	Withheld	Withheld	Withheld	7,997	1	Single Family	3	\$150,500.	1916	1967
Withheld	Withheld	Withheld	Withheld	7,130	2	Side/Side Duplex	3	\$314,000.	1984	1984
Withheld	Withheld	Withheld	Withheld	7,130	2	Side/Side Duplex	3	\$314,000.	1984	1984
Withheld	Withheld	Withheld	Withheld	5,443	1	Single Family	4	\$119,500.	1971	1973
Withheld	Withheld	Withheld	Withheld	5,433	2	Side/Side Duplex	2	\$116,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,365	1	Single Family	3	\$113,500.	1900	1973
Withheld	Withheld	Withheld	Withheld	5,433	2	Side/Side Duplex	2	\$116,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	9,310	1	Single Family	3	\$298,000.	1973	1973
Withheld	Withheld	Withheld	Withheld	7,222	1	Single Family	5	\$267,000.	1990	1991
Withheld	Withheld	Withheld	Withheld	9,310	1	Single Family	3	\$298,000.	1973	1973
Withheld	Withheld	Withheld	Withheld	4,654	1	Single Family	3	\$208,000.	1919	1973
Withheld	Withheld	Withheld	Withheld	5,738	2	Side/Side Duplex	2	\$172,500.	1980	1958
Withheld	Withheld	Withheld	Withheld	5,738	2	Side/Side Duplex	2	\$172,500.	1980	1958

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property		
								Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	3	\$248,000.	1957	2000
Withheld	Withheld	Withheld	Withheld	5,018	1	Single Family	3	\$202,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,520	1	Single Family	2	\$82,500.	1912	1980
Withheld	Withheld	Withheld	Withheld	5,154	1	Single Family	6	\$448,500.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,136	1	Single Family	3	\$116,000.	1929	1973
Withheld	Withheld	Withheld	Withheld	5,136	1	Single Family	4	\$162,500.	1926	1967
Withheld	Withheld	Withheld	Withheld	7,523	2	Side/Side Duplex	3	\$229,500.	1984	1984
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	3	\$257,000.	1966	1995
Withheld	Withheld	Withheld	Withheld	7,523	2	Side/Side Duplex	3	\$229,500.	1984	1984
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	3	\$230,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	4,182	2	Side/Side Duplex	3	\$228,500.	1984	1984
Withheld	Withheld	Withheld	Withheld	5,455	1	Single Family	4	\$304,500.	1904	1967
Withheld	Withheld	Withheld	Withheld	5,429	1	Single Family	4	\$87,500.	1942	1973
Withheld	Withheld	Withheld	Withheld	6,273	2	Side/Side Duplex	3	\$19,700.		1984
Withheld	Withheld	Withheld	Withheld	4,920	1	Single Family	4	\$223,500.	1915	1967
Withheld	Withheld	Withheld	Withheld	5,425	2	Side/Side Duplex	2	\$118,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,425	2	Side/Side Duplex	2	\$128,500.	1978	1980
Withheld	Withheld	Withheld	Withheld	5,132	1	Single Family	3	\$124,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,425	2	Side/Side Duplex	2	\$118,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,425	2	Side/Side Duplex	2	\$128,500.	1978	1980
Withheld	Withheld	Withheld	Withheld	4,920	1	Single Family	4	\$190,500.	1971	1972
Withheld	Withheld	Withheld	Withheld	4,760	1	Single Family	5	\$217,000.	1992	1993
Withheld	Withheld	Withheld	Withheld	5,150	1	Single Family	3	\$286,000.	1976	1980
Withheld	Withheld	Withheld	Withheld	5,126	1	Single Family	3	\$119,000.	1920	1973
Withheld	Withheld	Withheld	Withheld	7,264	2	Side/Side Duplex	3	\$184,500.	1972	1972
Withheld	Withheld	Withheld	Withheld	7,264	2	Side/Side Duplex	3	\$184,500.	1972	1972
Withheld	Withheld	Withheld	Withheld	7,240	2	Side/Side Duplex	3	\$185,500.	1972	1972
Withheld	Withheld	Withheld	Withheld	7,240	2	Side/Side Duplex	3	\$185,500.	1972	1972
Withheld	Withheld	Withheld	Withheld	5,106	2	Side/Side Duplex	2	\$122,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,106	2	Side/Side Duplex	2	\$122,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	4,715	1	Single Family	3	\$194,500.	1917	1967
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	5	\$302,000.	1917	1973
Withheld	Withheld	Withheld	Withheld	6,096	1	Single Family	4	\$193,000.	1977	1993
Withheld	Withheld	Withheld	Withheld	6,437	1	Single Family	4	\$107,000.	1971	1972
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	3	\$247,500.	1978	1980
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$251,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	6,831	2	Side/Side Duplex	3	\$342,500.	1990	1991
Withheld	Withheld	Withheld	Withheld	6,831	2	Side/Side Duplex	3	\$342,500.	1990	1991
Withheld	Withheld	Withheld	Withheld	6,816	1	Single Family	4	\$313,000.	1936	2000
Withheld	Withheld	Withheld	Withheld	4,760	1	Single Family	3	\$193,000.	1973	1973
Withheld	Withheld	Withheld	Withheld	6,992	2	Up/Dn Duplex	2	\$251,500.	1969	2000
Withheld	Withheld	Withheld	Withheld	6,992	2	Up/Dn Duplex	2	\$251,500.	1969	2000
Withheld	Withheld	Withheld	Withheld	5,280	1	Single Family	4	\$232,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,719	2	Side/Side Duplex	2	\$112,500.	1976	1980

**Application**

**Section 4, Line 4, 8, and 9**

**Description of Units**

**List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,719	2	Side/Side Duplex	2	\$112,500.	1976	1980
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$195,000.	1976	1980
Withheld	Withheld	Withheld	Withheld	5,056	1	Single Family	3	\$109,500.	1909	1973
Withheld	Withheld	Withheld	Withheld	5,280	1	Single Family	3	\$134,000.	1928	1967
Withheld	Withheld	Withheld	Withheld	4,880	1	Single Family	5	\$311,000.	1908	1967
Withheld	Withheld	Withheld	Withheld	4,800	1	Single Family	3	\$249,500.	1904	1967
Withheld	Withheld	Withheld	Withheld	5,021	2	Side/Side Duplex	2	\$230,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,021	2	Side/Side Duplex	2	\$230,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,060	1	Single Family	3	\$211,500.	1916	1980
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$241,500.	1976	1980
Withheld	Withheld	Withheld	Withheld	4,852	1	Single Family	4	\$366,000.	1960	1995
Withheld	Withheld	Withheld	Withheld	5,049	1	Single Family	4	\$105,500.	1913	1973
Withheld	Withheld	Withheld	Withheld	5,056	2	Side/Side Duplex	2	\$115,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,056	2	Side/Side Duplex	2	\$115,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,360	1	Single Family	3	\$199,500.	1976	1980
Withheld	Withheld	Withheld	Withheld	4,679	1	Single Family	4	\$221,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,099	1	Single Family	3	\$86,000.	1910	1973
Withheld	Withheld	Withheld	Withheld	6,270	1	Single Family	4	\$123,500.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$255,000.	1990	1991
Withheld	Withheld	Withheld	Withheld	5,072	1	Single Family	3	\$223,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	4,826	1	Single Family	3	\$194,000.	1899	1972
Withheld	Withheld	Withheld	Withheld	4,377	1	Single Family	3	\$195,000.	1910	1973
Withheld	Withheld	Withheld	Withheld	5,893	1	Single Family	6	\$471,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,799	1	Single Family	3	\$257,500.	1905	1980
Withheld	Withheld	Withheld	Withheld	5,350	1	Single Family	4	\$196,000.	1971	1972
Withheld	Withheld	Withheld	Withheld	5,395	1	Single Family	3	\$142,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	4,680	1	Single Family	3	\$232,500.	1983	1984
Withheld	Withheld	Withheld	Withheld	5,893	1	Single Family	6	\$483,500.	1900	1967
Withheld	Withheld	Withheld	Withheld	4,706	1	Single Family	4	\$174,000.	1914	1967
Withheld	Withheld	Withheld	Withheld	4,653	2	Side/Side Duplex	3	\$277,000.	1932	2000
Withheld	Withheld	Withheld	Withheld	4,653	2	Side/Side Duplex	3	\$277,000.	1932	2000
Withheld	Withheld	Withheld	Withheld	4,637	1	Single Family	4	\$172,500.	1909	1980
Withheld	Withheld	Withheld	Withheld	5,368	1	Single Family	3	\$108,500.	1976	1980
Withheld	Withheld	Withheld	Withheld	5,860	1	Single Family	4	\$188,500.	1971	1972
Withheld	Withheld	Withheld	Withheld	4,576	1	Single Family	4	\$163,000.	1971	1972
Withheld	Withheld	Withheld	Withheld	6,345	1	Single Family	3	\$250,500.	1978	1980
Withheld	Withheld	Withheld	Withheld	6,147	1	Single Family	5	\$267,000.	1903	1967
Withheld	Withheld	Withheld	Withheld	3,805	1	Single Family	3	\$208,000.	1909	1972
Withheld	Withheld	Withheld	Withheld	5,057	1	Single Family	4	\$233,000.	1907	1967
Withheld	Withheld	Withheld	Withheld	4,676	1	Single Family	3	\$213,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,133	1	Single Family	3	\$259,500.	1922	1973
Withheld	Withheld	Withheld	Withheld	5,799	1	Single Family	3	\$320,000.	1904	1972
Withheld	Withheld	Withheld	Withheld	6,880	1	Single Family	3	\$216,500.	1911	1973
Withheld	Withheld	Withheld	Withheld	4,960	1	Single Family	3	\$285,000.	1984	1984

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,164	1	Single Family	4	\$477,500.	1906	1973
Withheld	Withheld	Withheld	Withheld	5,802	1	Single Family	4	\$195,500.	1971	1972
Withheld	Withheld	Withheld	Withheld	7,222	1	Single Family	3	\$122,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,400	1	Single Family	2	\$376,000.	2012	2000
Withheld	Withheld	Withheld	Withheld	5,830	1	Single Family	3	\$183,500.	1979	1960
Withheld	Withheld	Withheld	Withheld	5,004	1	Single Family	4	\$237,500.	1922	1967
Withheld	Withheld	Withheld	Withheld	5,922	1	Single Family	2	\$217,000.	1923	1984
Withheld	Withheld	Withheld	Withheld	5,802	1	Single Family	5	\$199,500.	1914	1967
Withheld	Withheld	Withheld	Withheld	6,548	1	Single Family	3	\$219,500.	1959	2002
Withheld	Withheld	Withheld	Withheld	6,330	1	Single Family	4	\$124,000.	1904	1973
Withheld	Withheld	Withheld	Withheld	6,750	1	Single Family	3	\$268,500.	1908	2000
Withheld	Withheld	Withheld	Withheld	5,102	1	Single Family	3	\$203,500.	1909	1972
Withheld	Withheld	Withheld	Withheld	5,424	1	Single Family	6	\$403,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	4,760	1	Single Family	3	\$198,000.	1903	1972
Withheld	Withheld	Withheld	Withheld	5,395	1	Single Family	3	\$195,000.	1972	1972
Withheld	Withheld	Withheld	Withheld	5,450	1	Single Family	6	\$520,500.	1906	1967
Withheld	Withheld	Withheld	Withheld	4,737	1	Single Family	4	\$203,000.	1971	1972
Withheld	Withheld	Withheld	Withheld	5,034	1	Single Family	3	\$221,000.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,847	1	Single Family	3	\$192,500.	1979	1960
Withheld	Withheld	Withheld	Withheld	5,424	1	Single Family	4	\$346,000.	1904	1967
Withheld	Withheld	Withheld	Withheld	5,000	1	Single Family	2	\$210,500.	1954	1984
Withheld	Withheld	Withheld	Withheld	6,130	2	Side/Side Duplex	2	\$202,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,091	1	Single Family	4	\$129,500.	1921	1973
Withheld	Withheld	Withheld	Withheld	5,818	1	Single Family	4	\$185,000.	1906	1967
Withheld	Withheld	Withheld	Withheld	6,130	2	Side/Side Duplex	2	\$202,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,922	1	Single Family	3	\$253,500.	1907	2000
Withheld	Withheld	Withheld	Withheld	4,064	1	Single Family	3	\$174,500.	1971	1972
Withheld	Withheld	Withheld	Withheld	6,485	1	Single Family	3	\$108,000.	1976	1980
Withheld	Withheld	Withheld	Withheld	8,600	1	Single Family	4	\$231,500.	1900	1984
Withheld	Withheld	Withheld	Withheld	5,150	2	Side/Side Duplex	2	\$346,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	8,102	1	Single Family	3	\$191,500.	1990	1991
Withheld	Withheld	Withheld	Withheld	5,150	2	Side/Side Duplex	2	\$346,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,148	1	Single Family	3	\$137,500.	1914	1984
Withheld	Withheld	Withheld	Withheld	5,847	1	Single Family	3	\$196,000.	1979	1959
Withheld	Withheld	Withheld	Withheld	5,307	1	Single Family	4	\$104,000.	1971	1973
Withheld	Withheld	Withheld	Withheld	5,634	1	Single Family	4	\$208,500.	1908	1967
Withheld	Withheld	Withheld	Withheld	5,715	2	Side/Side Duplex	2	\$106,000.	1976	1980
Withheld	Withheld	Withheld	Withheld	5,715	2	Side/Side Duplex	2	\$106,000.	1976	1980
Withheld	Withheld	Withheld	Withheld	5,818	1	Single Family	3	\$218,500.	1971	1972
Withheld	Withheld	Withheld	Withheld	5,624	1	Single Family	4	\$276,000.	1904	1972
Withheld	Withheld	Withheld	Withheld	4,720	1	Single Family	4	\$207,500.	1901	1973
Withheld	Withheld	Withheld	Withheld	5,814	1	Single Family	3	\$106,000.	1925	1973
Withheld	Withheld	Withheld	Withheld	4,985	1	Single Family	4	\$169,000.	2000	2000
Withheld	Withheld	Withheld	Withheld	5,787	1	Single Family	4	\$241,500.	1903	1967

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,814	2	Side/Side Duplex	2	\$125,500.	1974	1980
Withheld	Withheld	Withheld	Withheld	5,814	2	Side/Side Duplex	2	\$125,500.	1974	1980
Withheld	Withheld	Withheld	Withheld	7,169	1	Single Family	4	\$222,500.	1914	2000
Withheld	Withheld	Withheld	Withheld	4,990	1	Single Family	3	\$183,000.	1973	1973
Withheld	Withheld	Withheld	Withheld	3,770	1	Single Family	2	\$208,000.	1923	1973
Withheld	Withheld	Withheld	Withheld	10,324	1	Single Family	3	\$166,500.	1991	1991
Withheld	Withheld	Withheld	Withheld	5,513	4	4 Plex	2	\$564,500.	1913	2000
Withheld	Withheld	Withheld	Withheld	5,513	4	4 Plex	2	\$564,500.	1913	2000
Withheld	Withheld	Withheld	Withheld	5,513	4	4 Plex	2	\$564,500.	1913	2000
Withheld	Withheld	Withheld	Withheld	5,513	4	4 Plex	2	\$564,500.	1913	2000
Withheld	Withheld	Withheld	Withheld	5,920	1	Single Family	5	\$328,000.	1900	1972
Withheld	Withheld	Withheld	Withheld	5,768	1	Single Family	3	\$91,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	7,252	1	Single Family	4	\$282,000.	1995	2005
Withheld	Withheld	Withheld	Withheld	4,984	1	Single Family	3	\$100,500.	1983	1984
Withheld	Withheld	Withheld	Withheld	5,107	1	Single Family	3	\$132,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,513	1	Single Family	3	\$200,000.	1905	1984
Withheld	Withheld	Withheld	Withheld	5,376	1	Single Family	4	\$201,500.	1976	1967
Withheld	Withheld	Withheld	Withheld	5,052	1	Single Family	4	\$198,500.	2000	2000
Withheld	Withheld	Withheld	Withheld	5,408	1	Single Family	4	\$210,500.	1924	1967
Withheld	Withheld	Withheld	Withheld	4,698	1	Single Family	3	\$142,500.	1955	1984
Withheld	Withheld	Withheld	Withheld	5,123	1	Single Family	2	\$164,500.	1924	1967
Withheld	Withheld	Withheld	Withheld	5,772	1	Single Family	4	\$227,500.	1911	1967
Withheld	Withheld	Withheld	Withheld	6,280	1	Single Family	3	\$95,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,105	1	Single Family	2	\$173,500.	1930	1984
Withheld	Withheld	Withheld	Withheld	6,680	1	Single Family	5	\$302,500.	1908	1967
Withheld	Withheld	Withheld	Withheld	4,960	1	Single Family	3	\$201,500.	1974	1973
Withheld	Withheld	Withheld	Withheld	5,415	1	Single Family	3	\$194,000.	1910	1967
Withheld	Withheld	Withheld	Withheld	4,630	1	Single Family	3	\$179,000.	1908	1973
Withheld	Withheld	Withheld	Withheld	5,376	1	Single Family	4	\$335,000.	1902	1980
Withheld	Withheld	Withheld	Withheld	8,397	1	Single Family	3	\$127,500.	1989	2002
Withheld	Withheld	Withheld	Withheld	4,774	1	Single Family	3	\$120,000.	1970	1973
Withheld	Withheld	Withheld	Withheld	7,909	1	Single Family	5	\$220,000.	1989	1993
Withheld	Withheld	Withheld	Withheld	6,988	1	Single Family	3	\$213,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,600	1	Single Family	3	\$197,000.	1990	1991
Withheld	Withheld	Withheld	Withheld	4,760	1	Single Family	4	\$284,500.	1995	1995
Withheld	Withheld	Withheld	Withheld	4,910	1	Single Family	4	\$142,500.	1911	1972
Withheld	Withheld	Withheld	Withheld	5,127	1	Single Family	3	\$105,500.	1965	1973
Withheld	Withheld	Withheld	Withheld	6,880	1	Single Family	4	\$264,000.	1900	1972
Withheld	Withheld	Withheld	Withheld	5,427	1	Single Family	3	\$158,500.	1924	1967
Withheld	Withheld	Withheld	Withheld	5,390	1	Single Family	4	\$194,000.	1908	1972
Withheld	Withheld	Withheld	Withheld	6,784	1	Single Family	4	\$300,000.	2000	2000
Withheld	Withheld	Withheld	Withheld	6,192	1	Single Family	3	\$241,500.	1906	1980
Withheld	Withheld	Withheld	Withheld	6,680	1	Single Family	4	\$281,000.	1953	1984
Withheld	Withheld	Withheld	Withheld	5,418	1	Single Family	4	\$343,500.	1900	1984

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,137	2	Side/Side Duplex	2	\$177,500.	1975	1980
Withheld	Withheld	Withheld	Withheld	5,124	1	Single Family	4	\$145,000.	1926	1973
Withheld	Withheld	Withheld	Withheld	5,137	2	Side/Side Duplex	2	\$177,500.	1975	1980
Withheld	Withheld	Withheld	Withheld	5,080	1	Single Family	2	\$187,000.	1911	1973
Withheld	Withheld	Withheld	Withheld	5,080	1	Single Family	3	\$235,500.	1921	1973
Withheld	Withheld	Withheld	Withheld	5,600	1	Single Family	3	\$210,500.	1907	1980
Withheld	Withheld	Withheld	Withheld	10,300	1	Single Family	3	\$215,500.	1957	2000
Withheld	Withheld	Withheld	Withheld	5,094	1	Single Family	4	\$219,000.	1972	1972
Withheld	Withheld	Withheld	Withheld	5,420	1	Single Family	4	\$398,500.	1916	1973
Withheld	Withheld	Withheld	Withheld	5,604	1	Single Family	3	\$155,500.	1924	1980
Withheld	Withheld	Withheld	Withheld	5,144	1	Single Family	4	\$219,000.	1906	1972
Withheld	Withheld	Withheld	Withheld	5,397	1	Single Family	2	\$196,000.	1911	1967
Withheld	Withheld	Withheld	Withheld	5,308	1	Single Family	3	\$195,000.	1904	1972
Withheld	Withheld	Withheld	Withheld	5,675	1	Single Family	3	\$184,000.	1953	2000
Withheld	Withheld	Withheld	Withheld	6,000	1	Single Family	3	\$232,000.	1908	2000
Withheld	Withheld	Withheld	Withheld	7,424	1	Single Family	2	\$190,500.	1955	1984
Withheld	Withheld	Withheld	Withheld	5,747	1	Single Family	4	\$227,000.	1910	1984
Withheld	Withheld	Withheld	Withheld	5,747	1	Single Family	3	\$189,000.	1910	1973
Withheld	Withheld	Withheld	Withheld	4,905	1	Single Family	3	\$307,000.	1924	1973
Withheld	Withheld	Withheld	Withheld	5,150	1	Single Family	4	\$263,000.	1948	2000
Withheld	Withheld	Withheld	Withheld	5,080	1	Single Family	2	\$164,000.	1924	2000
Withheld	Withheld	Withheld	Withheld	5,200	1	Single Family	4	\$307,500.	1991	1991
Withheld	Withheld	Withheld	Withheld	6,750	1	Single Family	3	\$216,500.	1943	1984
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$186,000.	1978	1984
Withheld	Withheld	Withheld	Withheld	5,431	1	Single Family	4	\$192,000.	1949	1984
Withheld	Withheld	Withheld	Withheld	5,240	1	Single Family	3	\$178,000.	1909	1967
Withheld	Withheld	Withheld	Withheld	6,680	1	Single Family	4	\$270,000.	1908	1967
Withheld	Withheld	Withheld	Withheld	5,394	1	Single Family	4	\$194,500.	1912	1967
Withheld	Withheld	Withheld	Withheld	5,056	1	Single Family	3	\$216,500.	1909	1967
Withheld	Withheld	Withheld	Withheld	6,280	1	Single Family	3	\$107,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	4,874	1	Single Family	3	\$144,500.	1983	1984
Withheld	Withheld	Withheld	Withheld	5,030	1	Single Family	4	\$107,000.	1907	1980
Withheld	Withheld	Withheld	Withheld	5,202	1	Single Family	3	\$168,000.	1925	1973
Withheld	Withheld	Withheld	Withheld	4,948	1	Single Family	3	\$264,000.	1918	1973
Withheld	Withheld	Withheld	Withheld	6,200	1	Single Family	4	\$231,000.	1966	2000
Withheld	Withheld	Withheld	Withheld	5,376	1	Single Family	2	\$186,500.	1923	1973
Withheld	Withheld	Withheld	Withheld	5,424	1	Single Family	3	\$306,500.	1913	1973
Withheld	Withheld	Withheld	Withheld	5,041	1	Single Family	3	\$94,500.	1978	1980
Withheld	Withheld	Withheld	Withheld	5,041	1	Single Family	3	\$105,500.	1907	1973
Withheld	Withheld	Withheld	Withheld	5,248	1	Single Family	4	\$190,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,200	1	Single Family	3	\$199,000.	1990	1967
Withheld	Withheld	Withheld	Withheld	5,040	1	Single Family	3	\$135,000.	1926	1984
Withheld	Withheld	Withheld	Withheld	7,588	1	Single Family	3	\$118,500.	1981	2002
Withheld	Withheld	Withheld	Withheld	4,998	1	Single Family	3	\$207,000.	1902	1967



**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc	LEGAL_Desc	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in		Unit Bedroom	Assessed Property		
	LOT	BLOCK			Building	Building Type	Count	Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,581	1	Single Family	5	\$318,500.	1915	1973
Withheld	Withheld	Withheld	Withheld	5,875	1	Single Family	5	\$196,500.	1911	1967
Withheld	Withheld	Withheld	Withheld	5,040	1	Single Family	2	\$195,500.	1926	1980
Withheld	Withheld	Withheld	Withheld	4,920	1	Single Family	3	\$182,000.	1918	1973
Withheld	Withheld	Withheld	Withheld	6,477	1	Single Family	4	\$263,000.	1990	1991
Withheld	Withheld	Withheld	Withheld	4,960	1	Single Family	3	\$308,000.	1932	2000
Withheld	Withheld	Withheld	Withheld	5,070	1	Single Family	4	\$391,000.	1908	1967
Withheld	Withheld	Withheld	Withheld	5,100	1	Single Family	3	\$132,000.	1956	1984
Withheld	Withheld	Withheld	Withheld	5,045	1	Single Family	4	\$253,000.	1931	1973
Withheld	Withheld	Withheld	Withheld	5,103	1	Single Family	2	\$137,000.	1947	1984
Withheld	Withheld	Withheld	Withheld	4,992	1	Single Family	3	\$188,500.	1972	1972
Withheld	Withheld	Withheld	Withheld	5,427	1	Single Family	4	\$240,500.	2000	2000
Withheld	Withheld	Withheld	Withheld	6,400	2	Side/Side Duplex	2	\$391,500.	1946	2000
Withheld	Withheld	Withheld	Withheld	4,575	1	Single Family	4	\$226,000.	1908	1973
Withheld	Withheld	Withheld	Withheld	6,400	2	Side/Side Duplex	2	\$391,500.	1946	2000
Withheld	Withheld	Withheld	Withheld	5,534	1	Single Family	3	\$241,500.	1915	2000
Withheld	Withheld	Withheld	Withheld	5,203	1	Single Family	3	\$189,000.	1909	1967
Withheld	Withheld	Withheld	Withheld	5,376	2	Side/Side Duplex	3	\$360,500.	1960	2000
Withheld	Withheld	Withheld	Withheld	5,376	2	Side/Side Duplex	3	\$360,500.	1960	2000
Withheld	Withheld	Withheld	Withheld	5,418	1	Single Family	3	\$199,000.	1976	1980
Withheld	Withheld	Withheld	Withheld	6,280	1	Single Family	3	\$110,000.	1909	1973
Withheld	Withheld	Withheld	Withheld	4,880	1	Single Family	4	\$226,000.	1991	1991
Withheld	Withheld	Withheld	Withheld	5,198	1	Single Family	3	\$289,000.	1908	1967
Withheld	Withheld	Withheld	Withheld	5,359	1	Single Family	3	\$187,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,016	1	Single Family	3	\$187,000.	1972	1972
Withheld	Withheld	Withheld	Withheld	5,200	1	Single Family	3	\$221,500.	1980	1958
Withheld	Withheld	Withheld	Withheld	5,051	1	Single Family	4	\$174,500.	1909	1967
Withheld	Withheld	Withheld	Withheld	5,053	1	Single Family	3	\$209,000.	1920	1967
Withheld	Withheld	Withheld	Withheld	4,680	1	Single Family	4	\$210,000.	1917	1973
Withheld	Withheld	Withheld	Withheld	5,056	1	Single Family	3	\$114,500.	1919	1984
Withheld	Withheld	Withheld	Withheld	5,116	1	Single Family	2	\$164,000.	1916	1984
Withheld	Withheld	Withheld	Withheld	4,890	1	Single Family	4	\$194,500.	1922	1967
Withheld	Withheld	Withheld	Withheld	5,221	1	Single Family	3	\$170,000.	1910	1967
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$243,000.	1990	1991
Withheld	Withheld	Withheld	Withheld	5,077	2	Side/Side Duplex	2	\$275,000.	1960	1980
Withheld	Withheld	Withheld	Withheld	5,116	1	Single Family	3	\$161,500.	1923	1984
Withheld	Withheld	Withheld	Withheld	5,077	2	Side/Side Duplex	2	\$275,000.	1960	1980
Withheld	Withheld	Withheld	Withheld	5,280	1	Single Family	3	\$187,000.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,371	1	Single Family	3	\$178,000.	1976	1980
Withheld	Withheld	Withheld	Withheld	6,000	1	Single Family	3	\$190,500.	1924	2000
Withheld	Withheld	Withheld	Withheld	4,935	1	Single Family	3	\$206,500.	1975	1980
Withheld	Withheld	Withheld	Withheld	6,280	1	Single Family	3	\$96,000.	1983	1984
Withheld	Withheld	Withheld	Withheld	5,346	1	Single Family	3	\$232,500.	1953	2000
Withheld	Withheld	Withheld	Withheld	5,080	1	Single Family	3	\$216,500.	1963	2002

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,410	1	Single Family	3	\$129,000.	2008	1991
Withheld	Withheld	Withheld	Withheld	5,076	1	Single Family	2	\$104,500.	1917	1980
Withheld	Withheld	Withheld	Withheld	10,095	1	Single Family	4	\$152,760	1970	1973
Withheld	Withheld	Withheld	Withheld	4,420	1	Single Family	3	\$236,000.	1924	1973
Withheld	Withheld	Withheld	Withheld	4,835	1	Single Family	4	\$223,000.	1920	1967
Withheld	Withheld	Withheld	Withheld	4,985	1	Single Family	3	\$242,500.	1949	1973
Withheld	Withheld	Withheld	Withheld	5,486	1	Single Family	4	\$237,500.	1911	1967
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$266,500.	1914	1973
Withheld	Withheld	Withheld	Withheld	4,994	1	Single Family	3	\$243,500.	1928	2000
Withheld	Withheld	Withheld	Withheld	5,040	1	Single Family	3	\$215,500.	1980	2002
Withheld	Withheld	Withheld	Withheld	5,228	1	Single Family	5	\$225,000.	1921	1967
Withheld	Withheld	Withheld	Withheld	5,079	1	Single Family	3	\$240,500.	1924	1973
Withheld	Withheld	Withheld	Withheld	5,129	1	Single Family	3	\$179,500.	1955	1967
Withheld	Withheld	Withheld	Withheld	6,400	1	Single Family	3	\$123,500.	1972	1972
Withheld	Withheld	Withheld	Withheld	5,228	1	Single Family	3	\$201,500.	1908	1967
Withheld	Withheld	Withheld	Withheld	4,852	1	Single Family	3	\$260,500.	1965	1980
Withheld	Withheld	Withheld	Withheld	4,401	1	Single Family	3	\$227,000.	1953	1973
Withheld	Withheld	Withheld	Withheld	4,779	1	Single Family	3	\$138,000.	1980	1959
Withheld	Withheld	Withheld	Withheld	4,878	1	Single Family	3	\$194,000.	1915	1973
Withheld	Withheld	Withheld	Withheld	6,400	2	Side/Side Duplex	2	\$131,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,517	1	Single Family	3	\$209,500.	1915	1973
Withheld	Withheld	Withheld	Withheld	6,400	2	Side/Side Duplex	2	\$131,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	4,880	1	Single Family	2	\$165,500.	1923	1980
Withheld	Withheld	Withheld	Withheld	4,905	1	Single Family	5	\$236,000.	1918	1973
Withheld	Withheld	Withheld	Withheld	5,082	1	Single Family	4	\$168,500.	1920	1967
Withheld	Withheld	Withheld	Withheld	5,080	1	Single Family	3	\$221,500.	1979	1960
Withheld	Withheld	Withheld	Withheld	5,916	1	Single Family	3	\$237,000.	1951	1984
Withheld	Withheld	Withheld	Withheld	5,101	1	Single Family	3	\$129,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	3,840	1	Single Family	3	\$111,000.	1983	1984
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$233,500.	1977	1980
Withheld	Withheld	Withheld	Withheld	5,899	2	Up/Dn Duplex	2	\$321,500.	1917	2000
Withheld	Withheld	Withheld	Withheld	5,899	2	Up/Dn Duplex	2	\$321,500.	1917	2000
Withheld	Withheld	Withheld	Withheld	4,114	1	Single Family	3	\$234,500.	1915	1973
Withheld	Withheld	Withheld	Withheld	5,286	1	Single Family	4	\$234,500.	1916	1967
Withheld	Withheld	Withheld	Withheld	5,715	1	Single Family	4	\$437,500.	1942	1973
Withheld	Withheld	Withheld	Withheld	5,040	2	Up/Dn Duplex	2	\$286,000.	1910	2000
Withheld	Withheld	Withheld	Withheld	5,040	2	Up/Dn Duplex	2	\$286,000.	1910	2000
Withheld	Withheld	Withheld	Withheld	5,080	1	Single Family	3	\$198,500.	1951	1980
Withheld	Withheld	Withheld	Withheld	6,257	1	Single Family	3	\$136,000.	1969	1973
Withheld	Withheld	Withheld	Withheld	5,453	1	Single Family	3	\$141,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,767	1	Single Family	3	\$154,500.	1931	1973
Withheld	Withheld	Withheld	Withheld	5,040	4	4 Plex	2	\$500,500.	1922	2000
Withheld	Withheld	Withheld	Withheld	5,040	4	4 Plex	2	\$500,500.	1922	2000
Withheld	Withheld	Withheld	Withheld	5,040	4	4 Plex	2	\$500,500.	1922	2000

**Application**

**Section 4, Line 4, 8, and 9**

**Description of Units**

**List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,040	4	4 Plex	2	\$500,500.	1922	2000
Withheld	Withheld	Withheld	Withheld	6,174	1	Single Family	3	\$120,500.	1968	1973
Withheld	Withheld	Withheld	Withheld	6,257	1	Single Family	4	\$144,000.	1970	1973
Withheld	Withheld	Withheld	Withheld	4,874	1	Single Family	2	\$168,000.	1920	1973
Withheld	Withheld	Withheld	Withheld	6,125	1	Single Family	4	\$337,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,226	1	Single Family	3	\$461,000.	1923	1973
Withheld	Withheld	Withheld	Withheld	4,514	1	Single Family	4	\$262,000.	1914	1973
Withheld	Withheld	Withheld	Withheld	4,835	1	Single Family	3	\$313,500.	1909	1973
Withheld	Withheld	Withheld	Withheld	5,281	1	Single Family	3	\$311,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	7,815	1	Single Family	5	\$328,000.	1925	2000
Withheld	Withheld	Withheld	Withheld	5,418	1	Single Family	4	\$266,000.	1992	1993
Withheld	Withheld	Withheld	Withheld	4,856	1	Single Family	3	\$236,000.	1974	1973
Withheld	Withheld	Withheld	Withheld	5,125	1	Single Family	3	\$134,000.	1950	1984
Withheld	Withheld	Withheld	Withheld	4,850	1	Single Family	4	\$266,500.	1926	1973
Withheld	Withheld	Withheld	Withheld	5,280	1	Single Family	3	\$265,500.	1991	1991
Withheld	Withheld	Withheld	Withheld	5,118	1	Single Family	3	\$214,500.	1971	1973
Withheld	Withheld	Withheld	Withheld	5,066	1	Single Family	3	\$146,500.	1983	1984
Withheld	Withheld	Withheld	Withheld	5,109	1	Single Family	3	\$188,000.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,080	1	Single Family	2	\$238,500.	1908	1973
Withheld	Withheld	Withheld	Withheld	5,200	1	Single Family	2	\$147,500.	1949	1980
Withheld	Withheld	Withheld	Withheld	5,206	1	Single Family	3	\$192,500.	1955	1973
Withheld	Withheld	Withheld	Withheld	4,106	1	Single Family	3	\$135,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	4,800	1	Single Family	3	\$251,000.	1951	1980
Withheld	Withheld	Withheld	Withheld	9,600	2	Side/Side Duplex	3	\$387,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,082	1	Single Family	4	\$280,000.	1906	1967
Withheld	Withheld	Withheld	Withheld	9,600	2	Side/Side Duplex	3	\$387,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,332	1	Single Family	3	\$222,000.	1956	2002
Withheld	Withheld	Withheld	Withheld	5,460	1	Single Family	3	\$184,000.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,492	1	Single Family	3	\$194,000.	1972	1972
Withheld	Withheld	Withheld	Withheld	5,282	1	Single Family	4	\$275,000.	1905	1973
Withheld	Withheld	Withheld	Withheld	6,689	1	Single Family	3	\$243,000.	1910	1973
Withheld	Withheld	Withheld	Withheld	4,098	1	Single Family	3	\$195,500.	1951	1973
Withheld	Withheld	Withheld	Withheld	5,186	1	Single Family	3	\$166,000.	1955	1973
Withheld	Withheld	Withheld	Withheld	4,760	1	Single Family	3	\$194,000.	1947	1973
Withheld	Withheld	Withheld	Withheld	14,865	2	Side/Side Duplex	3	\$226,000.	1960	2004
Withheld	Withheld	Withheld	Withheld	6,315	1	Single Family	4	\$239,000.	1981	1960
Withheld	Withheld	Withheld	Withheld	9,800	2	Side/Side Duplex	3	\$760,000.	1909	2004
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	3	\$196,000.	1954	1980
Withheld	Withheld	Withheld	Withheld	4,740	1	Single Family	3	\$295,500.	1930	1973
Withheld	Withheld	Withheld	Withheld	5,640	1	Single Family	4	\$225,000.	1975	1993
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	2	\$204,000.	1953	1980
Withheld	Withheld	Withheld	Withheld	4,940	1	Single Family	4	\$205,000.	1947	1967
Withheld	Withheld	Withheld	Withheld	6,134	1	Single Family	3	\$148,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	4,994	1	Single Family	4	\$159,000.	1971	1973

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc	LEGAL_Desc	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in		Unit Bedroom		Assessed Property		
	LOT	BLOCK			Building	Building Type	Count		Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	6,061	1	Single Family	3		\$208,500.	1975	1980
Withheld	Withheld	Withheld	Withheld	5,277	1	Single Family	3		\$188,500.	1990	1991
Withheld	Withheld	Withheld	Withheld	4,880	1	Single Family	3		\$220,000.	1979	1960
Withheld	Withheld	Withheld	Withheld	5,138	1	Single Family	3		\$129,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,418	1	Single Family	3		\$185,500.	1929	1973
Withheld	Withheld	Withheld	Withheld	5,138	1	Single Family	3		\$121,000.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,113	1	Single Family	4		\$191,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,043	1	Single Family	3		\$289,500.	1924	1973
Withheld	Withheld	Withheld	Withheld	5,715	4	4 Plex	2		\$479,500.	1924	2000
Withheld	Withheld	Withheld	Withheld	5,715	4	4 Plex	2		\$479,500.	1924	2000
Withheld	Withheld	Withheld	Withheld	5,715	4	4 Plex	2		\$479,500.	1924	2000
Withheld	Withheld	Withheld	Withheld	5,715	4	4 Plex	2		\$479,500.	1924	2000
Withheld	Withheld	Withheld	Withheld	5,117	1	Single Family	2		\$255,000.	1922	1973
Withheld	Withheld	Withheld	Withheld	8,505	2	Side/Side Duplex	2		\$338,000.	1947	2000
Withheld	Withheld	Withheld	Withheld	8,505	2	Side/Side Duplex	2		\$338,000.	1947	2000
Withheld	Withheld	Withheld	Withheld	6,168	2	Side/Side Duplex	2		\$273,000.	1928	2005
Withheld	Withheld	Withheld	Withheld	6,168	2	Side/Side Duplex	2		\$273,000.	1928	2005
Withheld	Withheld	Withheld	Withheld	5,104	1	Single Family	3		\$214,500.	1925	1967
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	4		\$254,000.	1917	1973
Withheld	Withheld	Withheld	Withheld	4,760	1	Single Family	3		\$250,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	4,760	1	Single Family	3		\$258,000.	1921	1967
Withheld	Withheld	Withheld	Withheld	5,139	1	Single Family	3		\$132,500.	1927	2002
Withheld	Withheld	Withheld	Withheld	5,138	1	Single Family	3		\$128,000.	1926	1973
Withheld	Withheld	Withheld	Withheld	5,330	1	Single Family	3		\$350,500.	1900	1973
Withheld	Withheld	Withheld	Withheld	10,383	1	Single Family	5		\$237,000.	1982	1995
Withheld	Withheld	Withheld	Withheld	4,597	1	Single Family	2		\$232,000.	1923	1973
Withheld	Withheld	Withheld	Withheld	6,450	1	Single Family	4		\$271,000.	1978	2000
Withheld	Withheld	Withheld	Withheld	4,403	1	Single Family	3		\$299,000.	1930	1984
Withheld	Withheld	Withheld	Withheld	5,040	1	Single Family	3		\$211,000.	1919	1973
Withheld	Withheld	Withheld	Withheld	6,506	1	Single Family	3		\$139,000.	1941	1984
Withheld	Withheld	Withheld	Withheld	12,688	1	Single Family	4		\$298,000.	1977	1972
Withheld	Withheld	Withheld	Withheld	12,688	1	Single Family	3		\$298,000.	1977	1972
Withheld	Withheld	Withheld	Withheld	4,428	1	Single Family	2		\$226,000.	1949	1984
Withheld	Withheld	Withheld	Withheld	5,504	1	Single Family	3		\$225,500.	1922	1980
Withheld	Withheld	Withheld	Withheld	8,100	2	Side/Side Duplex	3		\$324,500.	1931	1984
Withheld	Withheld	Withheld	Withheld	8,100	2	Side/Side Duplex	3		\$324,500.	1931	1984
Withheld	Withheld	Withheld	Withheld	9,333	1	Single Family	3		\$141,500.	1970	1973
Withheld	Withheld	Withheld	Withheld	9,715	1	Single Family	4		\$127,000.	1970	1973
Withheld	Withheld	Withheld	Withheld	5,588	1	Single Family	4		\$532,500.	1996	2000
Withheld	Withheld	Withheld	Withheld	5,040	1	Single Family	3		\$277,000.	1920	2000
Withheld	Withheld	Withheld	Withheld	6,087	1	Single Family	3		\$203,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,760	1	Single Family	3		\$208,500.	1980	1958
Withheld	Withheld	Withheld	Withheld	5,080	1	Single Family	3		\$281,500.	1990	1991
Withheld	Withheld	Withheld	Withheld	10,160	2	Up/Dn Duplex	3		\$379,500.	1960	2000

**Application****Section 4, Line 4, 8, and 9****Description of Units****List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	10,160	2	Up/Dn Duplex	3	\$379,500.	1960	2000
Withheld	Withheld	Withheld	Withheld	4,920	1	Single Family	3	\$295,500.	1990	1991
Withheld	Withheld	Withheld	Withheld	7,005	1	Single Family	4	\$348,500.	1912	1973
Withheld	Withheld	Withheld	Withheld	7,498	1	Single Family	3	\$138,500.	1954	1973
Withheld	Withheld	Withheld	Withheld	4,953	1	Single Family	3	\$305,000.	1984	1984
Withheld	Withheld	Withheld	Withheld	4,937	1	Single Family	3	\$278,000.	1973	1973
Withheld	Withheld	Withheld	Withheld	7,327	1	Single Family	4	\$130,500.	1970	1973
Withheld	Withheld	Withheld	Withheld	5,064	1	Single Family	3	\$162,500.	1954	2002
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	4	\$395,500.	1920	1984
Withheld	Withheld	Withheld	Withheld	5,009	1	Single Family	3	\$125,500.	1969	1973
Withheld	Withheld	Withheld	Withheld	4,953	1	Single Family	2	\$277,000.	1922	1984
Withheld	Withheld	Withheld	Withheld	10,160	2	Side/Side Duplex	2	\$405,500.	1951	2000
Withheld	Withheld	Withheld	Withheld	10,160	2	Side/Side Duplex	2	\$405,500.	1951	2000
Withheld	Withheld	Withheld	Withheld	6,247	1	Single Family	4	\$122,500.	1970	1973
Withheld	Withheld	Withheld	Withheld	5,202	1	Single Family	4	\$150,500.	1972	1972
Withheld	Withheld	Withheld	Withheld	5,151	1	Single Family	5	\$203,000.	1922	1967
Withheld	Withheld	Withheld	Withheld	8,766	1	Single Family	5	\$139,500.	1971	1972
Withheld	Withheld	Withheld	Withheld	5,000	1	Single Family	3	\$125,000.	1972	1972
Withheld	Withheld	Withheld	Withheld	8,830	1	Single Family	3	\$139,000.	1970	1973
Withheld	Withheld	Withheld	Withheld	5,274	1	Single Family	3	\$115,000.	1970	1973
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	3	\$135,500.	1980	1959
Withheld	Withheld	Withheld	Withheld	4,998	1	Single Family	3	\$294,500.	1991	1991
Withheld	Withheld	Withheld	Withheld	5,040	1	Single Family	3	\$339,000.	1991	1991
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	2	\$183,500.	1925	1980
Withheld	Withheld	Withheld	Withheld	5,526	1	Single Family	3	\$156,500.	1945	2002
Withheld	Withheld	Withheld	Withheld	7,560	2	Side/Side Duplex	3	\$244,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	6,247	1	Single Family	3	\$119,000.	1970	1973
Withheld	Withheld	Withheld	Withheld	5,274	1	Single Family	4	\$118,500.	1970	1973
Withheld	Withheld	Withheld	Withheld	6,275	1	Single Family	3	\$128,000.	1971	1972
Withheld	Withheld	Withheld	Withheld	7,560	2	Side/Side Duplex	3	\$244,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$233,500.	1929	1980
Withheld	Withheld	Withheld	Withheld	6,141	1	Single Family	2	\$107,500.	1936	1980
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	4	\$229,500.	1971	1973
Withheld	Withheld	Withheld	Withheld	4,922	1	Single Family	3	\$291,000.	1962	1993
Withheld	Withheld	Withheld	Withheld	8,843	1	Single Family	3	\$279,000.	1968	1993
Withheld	Withheld	Withheld	Withheld	5,057	1	Single Family	3	\$307,000.	1949	1973
Withheld	Withheld	Withheld	Withheld	7,150	1	Single Family	3	\$166,500.	1923	1984
Withheld	Withheld	Withheld	Withheld	7,246	1	Single Family	4	\$196,500.	1947	1980
Withheld	Withheld	Withheld	Withheld	4,164	1	Single Family	4	\$120,500.	1969	1973
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	2	\$251,500.	1956	1995
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	3	\$213,500.	1990	1991
Withheld	Withheld	Withheld	Withheld	6,350	1	Single Family	3	\$284,500.	1956	2000
Withheld	Withheld	Withheld	Withheld	5,410	1	Single Family	3	\$304,500.	1948	1967
Withheld	Withheld	Withheld	Withheld	5,130	1	Single Family	3	\$237,000.	1947	1973

**Application**

**Section 4, Line 4, 8, and 9**

**Description of Units**

**List of Scattered Site Properties**

Address	LEGAL_Desc LOT	LEGAL_Desc BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Units in Building	Building Type	Unit Bedroom Count	Assessed Property Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,040	1	Single Family	3	\$185,000.	1972	1973
Withheld	Withheld	Withheld	Withheld	4,613	1	Single Family	2	\$180,500.	1956	1973
Withheld	Withheld	Withheld	Withheld	6,400	1	Single Family	3	\$181,500.	1951	2002
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	4	\$204,500.	1949	1984
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	4	\$247,500.	1927	1993
Withheld	Withheld	Withheld	Withheld	8,704	1	Single Family	2	\$200,000.	1927	1973
Withheld	Withheld	Withheld	Withheld	5,129	1	Single Family	4	\$232,000.	1925	1973
Withheld	Withheld	Withheld	Withheld	9,088	1	Single Family	5	\$297,500.	1922	1995
Withheld	Withheld	Withheld	Withheld	5,124	1	Single Family	3	\$310,000.	1991	1991
Withheld	Withheld	Withheld	Withheld	5,128	1	Single Family	3	\$245,000.	1947	1973
Withheld	Withheld	Withheld	Withheld	5,632	1	Single Family	3	\$213,000.	1957	2002
Withheld	Withheld	Withheld	Withheld	5,922	2	Side/Side Duplex	2	\$220,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	5,922	2	Side/Side Duplex	2	\$220,500.	1973	1973
Withheld	Withheld	Withheld	Withheld	6,458	1	Single Family	3	\$197,000.	1954	2000
Withheld	Withheld	Withheld	Withheld	5,130	1	Single Family	3	\$183,500.	1973	1972
Withheld	Withheld	Withheld	Withheld	6,750	1	Single Family	3	\$281,000.	1973	2000
Withheld	Withheld	Withheld	Withheld	6,300	1	Single Family	2	\$152,000.	1949	1973
Withheld	Withheld	Withheld	Withheld	6,250	2	Side/Side Duplex	2	\$275,000.	1948	2000
Withheld	Withheld	Withheld	Withheld	5,955	1	Single Family	3	\$216,500.	1942	1973
Withheld	Withheld	Withheld	Withheld	6,250	2	Side/Side Duplex	2	\$275,000.	1948	2000
Withheld	Withheld	Withheld	Withheld	6,250	2	Side/Side Duplex	2	\$278,500.	1949	2000
Withheld	Withheld	Withheld	Withheld	6,250	2	Side/Side Duplex	2	\$278,500.	1949	2000
Withheld	Withheld	Withheld	Withheld	7,649	1	Single Family	3	\$235,500.	1948	1973
Withheld	Withheld	Withheld	Withheld	5,120	1	Single Family	2	\$190,000.	1947	1973
Withheld	Withheld	Withheld	Withheld	6,417	1	Single Family	4	\$255,500.	1948	2000
Withheld	Withheld	Withheld	Withheld	6,704	1	Single Family	3	\$195,500.	1949	1973
Withheld	Withheld	Withheld	Withheld	6,731	1	Single Family	4	\$263,500.	1957	2000
Withheld	Withheld	Withheld	Withheld	7,920	1	Single Family	2	\$218,500.	1922	1973
Withheld	Withheld	Withheld	Withheld	6,300	2	Side/Side Duplex	2	\$323,500.	1953	2000
Withheld	Withheld	Withheld	Withheld	6,300	2	Side/Side Duplex	2	\$323,500.	1953	2000
Withheld	Withheld	Withheld	Withheld	6,625	1	Single Family	3	\$254,500.	1955	1984
Withheld	Withheld	Withheld	Withheld	5,240	1	Single Family	4	\$309,500.	1966	1993
Withheld	Withheld	Withheld	Withheld	5,715	1	Single Family	3	\$222,500.	1952	2000
Withheld	Withheld	Withheld	Withheld	5,352	1	Single Family	4	\$157,000.	1925	1967
Withheld	Withheld	Withheld	Withheld	4,464	1	Single Family	3	\$191,500.	1922	1984
Withheld	Withheld	Withheld	Withheld	5,000	2	Side/Side Duplex	2	\$157,000.	1980	1959
Withheld	Withheld	Withheld	Withheld	5,000	2	Side/Side Duplex	2	\$157,000.	1980	1959
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	4	\$277,000.	1990	1991
Withheld	Withheld	Withheld	Withheld	5,713	1	Single Family	3	\$154,000.	1932	1973
Withheld	Withheld	Withheld	Withheld	5,334	1	Single Family	3	\$99,000.	1969	1973
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	4	\$275,000.	1990	2000
Withheld	Withheld	Withheld	Withheld	5,344	1	Single Family	3	\$130,000.	1921	1967
Withheld	Withheld	Withheld	Withheld	2,163	1	Single Family	4	\$227,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,000	2	Side/Side Duplex	2	\$288,500.	1972	1973

### List of Scattered Site Properties

	LEGAL_Desc	LEGAL_Desc			Units in		Unit Bedroom	Assessed Property		
Address	LOT	BLOCK	Legal_Desc Metes and Bounds Full Description	Lot Area	Building	Building Type	Count	Value	Year Built	Year Acquired
Withheld	Withheld	Withheld	Withheld	5,000	2	Side/Side Duplex	2	\$288,500.	1972	1973
Withheld	Withheld	Withheld	Withheld	5,160	1	Single Family	4	\$240,500.	1924	1967
Withheld	Withheld	Withheld	Withheld	5,180	1	Single Family	3	\$278,000.	1900	1973
Withheld	Withheld	Withheld	Withheld	9,710	1	Single Family	4	\$189,500.	1913	1967
Withheld	Withheld	Withheld	Withheld	5,347	1	Single Family	3	\$136,000.	1910	1967
Withheld	Withheld	Withheld	Withheld	4,730	1	Single Family	5	\$331,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,342	1	Single Family	5	\$151,000.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,334	1	Single Family	4	\$149,500.	1912	1967
Withheld	Withheld	Withheld	Withheld	5,268	1	Single Family	3	\$99,500.	1900	1967
Withheld	Withheld	Withheld	Withheld	5,336	1	Single Family	4	\$164,000.	1921	1967
Withheld	Withheld	Withheld	Withheld	5,331	1	Single Family	4	\$130,000.	1914	1967
Withheld	Withheld	Withheld	Withheld	5,334	1	Single Family	4	\$146,500.	1980	1960
Withheld	Withheld	Withheld	Withheld	4,071	1	Single Family	4	\$227,500.	1900	1973
Withheld	Withheld	Withheld	Withheld	35,475	1	Single Family	4	\$928,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	35,475	2	Side/Side Duplex	5	\$928,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	35,475	2	Side/Side Duplex	4	\$928,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	35,475	1	Single Family	4	\$928,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	35,475	2	Side/Side Duplex	4	\$928,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	35,475	2	Side/Side Duplex	5	\$928,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	35,475	2	Side/Side Duplex	4	\$928,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	35,475	2	Side/Side Duplex	5	\$928,000.	1968	1969
Withheld	Withheld	Withheld	Withheld	18,064	5	Townhouse	4	\$1,408,500.	2006	2006
Withheld	Withheld	Withheld	Withheld	18,064	5	Townhouse	3	\$1,408,500.	2006	2006
Withheld	Withheld	Withheld	Withheld	18,064	5	Townhouse	3	\$1,408,500.	2006	2006
Withheld	Withheld	Withheld	Withheld	18,064	5	Townhouse	3	\$1,408,500.	2006	2006
Withheld	Withheld	Withheld	Withheld	18,064	5	Townhouse	4	\$1,408,500.	2006	2006
Withheld	Withheld	Withheld	Withheld	9,758	6	Townhouse	4	\$987,000.	2002	2017
Withheld	Withheld	Withheld	Withheld	9,758	6	Townhouse	3	\$987,000.	2002	2017
Withheld	Withheld	Withheld	Withheld	9,758	6	Townhouse	4	\$987,000.	2002	2017
Withheld	Withheld	Withheld	Withheld	9,758	6	Townhouse	4	\$987,000.	2002	2017
Withheld	Withheld	Withheld	Withheld	9,758	6	Townhouse	3	\$987,000.	2002	2017
Withheld	Withheld	Withheld	Withheld	9,758	6	Townhouse	4	\$987,000.	2002	2017

**Application****Section 5 (General) and Section 5, line 6****Description of Proposed Removal (General) and Timetable****General**

All units will be disposed of to Minneapolis Public Housing Authority's (MPHA) instrumentality, Community Housing Resources (CHR), a Minnesota nonprofit corporation. All units will have a use restriction for 30 years, per an agreement with HUD, and the HAP contract will require renewal.

**Line 6****Timetable**

Since residents are not being relocated from their units and MPHA does not anticipate a contract For Sale separate from the deed, all milestones are set at 180 days. 180 days provides time to prepare some properties so that they will meet HQS standards.

Approximately five vacant units will be disposed of on this schedule and then substantially rehabilitated or demolished and replaced, with the units then placed under the 30-year use restriction.



**Application**  
**Section 5, line 5**  
**FMV Description**

The Fair Market Value was obtained using the Estimated Market Value established by the City of Minneapolis Assessor's Office. Valuations were developed by the City of Minneapolis Assessor's Office, using the same methodology used across the City to establish market value.

**Application****Section 6, Line 2****Resident Displacement -- Summary**

The Minneapolis Public Housing Authority (MPHA) plans to utilize the Section 18 Disposition program to transfer the ownership of the scattered site units from MPHA's public housing program to MPHA's instrumentality, Community Housing Resources, a Minnesota nonprofit corporation. MPHA's application for disposition will not displace the current residents of the 729 occupied scattered sites. Residents will remain in their homes as the conversion from Annual Contributions Contract (ACC) to Project-Based Voucher (PBV) takes place and will have no disruption in services.

There is the possibility that some scattered site units will need extensive modernization in later years, after the disposition and commitment of PBVs to the units. MPHA will try to take care of the work when a family moves out so as not to require relocation. If work is required for occupied units, MPHA expects to provide temporary relocation to other MPHA units and will provide units, relocation counseling, and benefits as required by law, including moving services and utility transfers. Families would maintain the right to return upon completion.

**Application****Section 6, Line 3****Counseling and Advisory Services**

Counseling services will be available as needed to provide information on the transfer of the unit from Annual Contributions Contract (ACC) to Project-Based Voucher (PBV) and to answer resident inquiries. Residents have been notified that they will not be displaced, their rent will not change, and they will be assisted in any way possible to ensure families are informed and comfortable with the process. Minneapolis Public Housing Authority (MPHA) staff will continue to be available to residents to answer resident inquiries.

**Application**  
**Section 6, Line 6**  
**Comparable Units**

The Minneapolis Public Housing Authority (MPHA) plans to utilize the Section 18 Disposition program to transfer the ownership of the scattered site units from MPHA's Public Housing Program to MPHA's instrumentality, Community Housing Resources, a Minnesota nonprofit corporation. MPHA's application for disposition will not displace the current residents in the 729 occupied Scattered Sites. Residents will remain in their homes as the conversion from Annual Contributions Contract (ACC) to Project-Based Voucher (PBV) takes place and will have no disruption in services.

**Application****Section 6, line 7****Explanation of Tenant Protection Vouchers (TPV) Request**

Minneapolis Public Housing Authority (MPHA) intends to apply for 736 replacement vouchers to fully replace the public housing units, all of which have been occupied within the past two years. As detailed elsewhere, MPHA intends to use funding from the TPV awards to attach project-based vouchers to the current units on a long-term basis.

**Application**  
**Section 6, Line 8**  
**Relocation Expenses**

The Minneapolis Public Housing Authority (MPHA) will provide Resident Counseling and Advisory Services as needed to the scattered site residents. In addition, residents have already been notified that they will not be displaced, that their rent will not change and that will be assisted in any way possible to ensure families are informed and comfortable with the process. Minneapolis Public Housing Authority (MPHA) staff will continue to be available to residents to answer resident inquiries.

MPHA will utilize Operating Subsidy and Capital Funds for these counseling and advisory services.

## **Application**

### **Section 7, Line 1**

#### **MPHA's Consultation with Scattered Sites Residents**

In August 2018, MPHA held the required public hearing as well as additional public meetings to present and take comment on MPHA's 2018 MTW Annual Plan (which included a section on MPHAs intentions to submit a Section 18 application for the disposition of the scattered site units).

MPHA staff presented on Section 18 to the RAB at its regular meeting in January 2019. This is described more fully in Section 7, Line 4.

In early February, MPHA held three meetings to which all affected residents were invited by personally addressed letter and an automated phone message.[\[1\]](#)

MPHA held these resident meetings at varying times to accommodate different schedules:

- Saturday, February 2, 2019 from 10 am to 12 pm
- Thursday, February 7, 2019 from 1 pm to 3 pm
- Tuesday, February 12, 2019 from 6 pm to 8 pm

MPHA provided interpretation in Somali and Hmong (no other languages were requested or needed). Approximately 75 residents attended, across the three meetings. MPHA presented a slide deck on the application, followed by a large group Q&A and then small-group discussions, after which each table shared out questions and reactions about Section 18 or their homes in general. After this, residents could visit multiple tables to leave additional feedback, meet with MPHA staff about work orders, visit with property staff, and pick up additional materials on MPHA programs.

Residents did not submit any written questions, but they did ask questions verbally that MPHA staff addressed at the three meetings. These included:

- *Do you have a timeline for this process and how long it will take?* We explained that the timeline for next steps will depend on if and when we receive approval from HUD. If we receive approval, MPHA will be in touch with residents about a process for signing a new lease. Residents will not have to move out and will stay in their current homes. If there are any necessary improvements that need to be made, MPHA will work with residents to find housing for a temporary period while renovations are completed.
- *Many of the homes have no air conditioning, only one bathroom for a large family, and other repair needs. How will you improve our homes?* MPHA plans to complete a Physical Needs Assessment on each of the properties to learn more about each home and the potential needs residents had raised. MPHA shared some examples of modernization projects that have been completed such as adding a bathroom to a home.

Overall, residents expressed their gratitude for the information on Section 18 and the opportunity to attend a meeting. They support MPHA's application and want to be continually communicated through a variety of means about MPHA's progress with the Section 18 application and future steps affecting their homes.

***The handout and presentation used for the meeting is attached.***

[1] MPHA does not have a portfolio-wide resident organization (a separate organization represents only our highrise residents, who are unaffected by this application). In addition, the Minneapolis Scattered Site Resident Council has been inactive for several years. In light of this, MPHA took thorough measures to assure all affected residents were notified and had multiple opportunities to engage.





# Preserving Family Homes

HUD's "Section 18" program to fund home improvements and sustain public housing

## WHY is MPHA applying for this HUD program?

MPHA needs to maintain and update more than 700 family homes across the city. To preserve these homes, **MPHA has decided to apply for HUD's Section 18 program.** The program will give MPHA more money to take care of public housing.

## WHAT does this mean for residents?

### MPHA's commitments to families:

- You will **not have to move.**
- You will **not lose your housing benefits.**
- MPHA will **still be your property manager.**
- **Your rent calculation will remain at 30%** of your adjusted income, the same as now.
- MPHA's use of the Section 18 program **will not eliminate, reduce, or privatize any public housing.**
- You may experience **more improvements and repairs to your home** with the increased funding.
- The long-term arrangement will guarantee the homes **serve only low-income families.**

## HOW does the new program work?

### STEP 1: APPLY

Since **current federal funding is not enough to operate and maintain housing long-term**, MPHA is applying for HUD's Section 18 program. Through Section 18, MPHA will apply "disposition" of these properties (sometimes referred to as MPHA's "scattered sites").

### STEP 2: MPHA-OWNED NONPROFIT

In this case, "disposition" means **MPHA will transfer the properties to our own public nonprofit that is 100% controlled by the housing authority.** Residents will sign a new lease. The change will otherwise have little or no impact for most residents.

### STEP 3: FUNDING

The approved Section 18 application leads to a **large increase in the subsidy amount, which allows MPHA to improve and rehab housing.**

### STEP 4: CONVERSION

MPHA will **convert the subsidy into project-based vouchers (PBVs). PBVs are attached permanently to the scattered-site house** and operate much the way public housing currently operates. MPHA will continue to property-manage this family housing through the nonprofit.



# Xafididda Guryaha Qoysaska ee hal-halka ah

Barnaamijka HUD ee sharciga xeerka qaybta “Section 18” ee lagu maalgaliyo dayactirka guryaha iyo sii-wadida guryaha dadweynaha

## Waa maxey **SABABTA** ay mpha u codsaneyso barnaamijkaan HUD?

MPHA waxey u baahan tahay in ay sii socodsiiso oo casriyeyso in ka badan 700 oo ah guryaha hal-halka qoys iyo qoysaska badan. Si loo dhawro ama xafido guryahaan, **Gudiga xukuma MPHA waxey codsadeen barnaamijka HUD ee sharciga xeerka qaybta 18 ama Section 18.** Barnaamijkaan wuxuu siinayaa MPHA lacag badan si wax looga qabto ama taxadaro guryeynta dadweynaha.

## **MAXEY** muhiim ama micne ugu leedahay degeneyaasha tani?

### **Ballanqaadka MPHA ee qoysaska:**

- Adigu ma’ahan **in aad guurto.**
- Adiga ma dhumineysid **Faa’idooyinkaaga guryeynta.**
- MPHA waxey ahaan doonta **wili maamulaha gurigaaga.**
- **Xisaabinta kiradaada waxey baaqi ku ahaaneysaa 30%** ee daqligaaga kharashka laga go; yey, siduu hada yahay.
- Isticmaalka MPHA ee barnaamijka xeerka qaybta Section 18 **meesha kama tirtirayo, yareynayo, amase kama dhigayo guryaha dadweynaha mid gaar loo leeyahay.**
- Adiga waxaa suurogal ah in aad la kulanto **dayactiro badan iyo horumarin gurigaaga** oo timaada maalgelintaa dheeraadka ah.
- Waxey dammaanad qaadeysaa in guryaha ay u **adeegaan kaliyaha qoysaska uu daqligoodu yaryahay.**

## **SIDEE** ayuu u shaqeynayaa barnaamijkaan cusub?

### **TILAABADA 1: CODSASHO**

Madaama **qoondada maalgelinta ee hada ay ku filneyn hawlgalka iyo dayactirka guryeynta muda dheer**, MPHA waxey codsatey barnaamijka HUD ee xeerka qaybta Section 18. Barnaamijkaan waxa uu u ogalaanayaa MPHA in ay codsato “Hanti Nidaamis” ee hantida guryaha.

### **TILAABADA 2: HAY’AD AAN FAA’IDO DOON AHAYN OO MPHA LEEDAHAY**

Arintaan, ereyga “Hanti Nidaamis” ama “disposition” micnihiisu waa in ay **MPHA ay ku wareejineyso hantida dhismayaasheeda hay’add aan faa’ido doon ahayn oo dadka u dhaxeeyso oo aan leenahay, taas oo 100% ay xukunto masuuliyiinta hay’adda guryeynta.** Dadka degeneyaasha waxey saxiixayaan heshiis guri oo cusub. Isbadalkaana wuxuu ku yeelanayaa saameyn yar ama sameyn la’aan badanaa degeneyaasha.

### **TILAABADA 3: QOONDADA MAALGELINTA**

Arjiga codsashada ee la ansixiyee ee xeerka sharciga qaybta Section 18 wuxuu keenayaa **kordhis ballaaran ee cadadka kaalmada dhaqaale, taas oo u ogalaaneysa MPHA in ay horumariso ayna dayactirto guryeynta.**

### **TILAABADA 4: BADALAAD**

MPHA waxey u **badaleysaa kabitaanka kaalmada (subsidy) mid ku saleysan foojarada mashruuca guryaha (PBVs).** PBVs waxey ku dheganaanayaa ama ku saleysnaanyaan si joogta ah guryaha **goobaha ku kula firirsan** waxeyna u shaqeynayaa si aad ula mid ah sida ay hadda u shaqeyaan guryaha dadweynahay. MPHA ayaa sii wadi doonta maamulida guryeynta qoysaska ee goobaha ku firirsan ayada oo adeegsaneysa hay’ada aan faa’ido doonka ahayn.

# PRESERVING SINGLE FAMILY HOMES: HUD's "Section 18" program to fund home improvements and sustain public housing



- **Opening Remarks**
- **Part 1 – Section 18**
  - MPHA short presentation
  - Questions about Section 18
- **Part 2 – Small Group Discussion**
  - Share your general thoughts/reactions/comments on Section 18
  - How do residents want to be updated?
  - What would entice you to participate in strategy discussions?
- **Part 3 – Open House Tables**
  - Learn more about Section 18. Tell us what you like or dislike about your home.
  - Discuss outstanding & new work orders
  - Interested in participating in a resident council? Want to learn more about homeownership programs?

# Welcome & Introductions

## PURPOSE:

- Consult with residents on the decision to pursue the Section 18 application process as required by HUD.
- MPHA wants to involve residents in shaping the larger family housing strategy, build a communications channel, and build relationships.

# Resident Consultation Meeting

## AGENDA

- Opening Remarks
- Part 1 – Section 18
- Part 2 – Small Group Discussion
- Part 3 – Open House Tables

# WHY is MPHA applying for this HUD program?

MPHA needs to maintain and update more than 700 single family homes across the city.

To preserve these homes, **MPHA has decided to apply for HUD's Section 18 program.** The program will give MPHA more money to take care of public housing.

# WHAT does this mean for residents?

## **MPHA's commitments to families:**

- You will not have to move
- You will not lose your housing benefits
- MPHA will still be your property manager
- Your rent calculation will remain at 30% of your adjusted income, the same as now
- MPHA's use of Section 18 program will not eliminate, reduce, or privatize any public housing
- You may experience more improvements and repairs to your home with the increased funding
- The long-term arrangement will guarantee the homes serve only low-income families



# HOW does the new program work?

## STEP 1: HUD APPLICATION

Since current federal funding is not enough to operate and maintain housing long-term, MPHA is applying for HUD's Section 18 program. Through Section 18, MPHA will apply "disposition" of these properties.



## STEP 2: MPHA-OWNED NON-PROFIT

"Disposition" means MPHA will transfer the properties to our own public non-profit that is 100% controlled by the housing authority.



## STEP 3: FUNDING

When approved, HUD increases the subsidy, which allows MPHA to improve and rehab housing.



## STEP 4: CONVERSION

MPHA will convert the subsidy into project-based vouchers (PBVs). PBVs are attached permanently to the scattered-site house and operate much the way public housing currently operates.

MPHA will submit the application in February after Board approval

Residents will sign a new lease. The change will otherwise have little or no impact for most residents.

MPHA will continue to manage and maintain all of the housing through the non-profit.



# WHAT are the next steps?

## TODAY

- Ask questions & share reactions
- Help decide how to receive communications as process moves forward
- Help decide how to participate in designing future of family housing
- Time after for individual questions, including work orders

## UPCOMING

- Physical Needs Assessment to happen at all properties
  - MPHA will provide advance notice to residents
- You will be asked to sign a new lease with our nonprofit
  - No changes to rent or rights
- Opportunities to help inform the big-picture strategy for the long-term

# LOOKING FORWARD: Big-Picture Strategy



Maintenance,  
Remodels, and  
Energy  
Improvements



New Construction

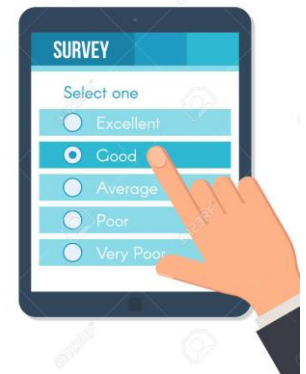


New Services

# Ways to Participate in the Big-Picture Strategy



- Surveys (online or mailed)
- Meetings
- Open houses
- Small Groups
- Design meetings
- Include kids





The background image shows a green house with a red roof. A large tree with yellow autumn leaves is on the left. The house has a white arched window in the gable and a white-framed window on the right. The house number '2014' is visible above the front door.

# Questions/clarifications about Section 18?

We will compile all feedback and provide  
all meeting materials online at  
[mphaonline.org/preserving-family-homes](https://mphaonline.org/preserving-family-homes)

# Small Group Discussion

1. One person in each small group will volunteer to summarize the discussion for the larger group.
2. In one minute or less, each person in the group share your response to the question (you can pass).
3. As a group, discuss 2 to 3 themes or important highlights for your volunteer speaker to share with the full group.
4. After about ten minutes the facilitators will ask you to come back together to share your highlights.

## Small group topic questions

1. Discuss your reactions and comments to MPHA's plans to apply for Section 18.
2. Applying for Section 18 and making upgrades to homes will take a number of years. How do you want to be informed about MPHA's progress?
3. MPHA wants to know what residents think about updating their homes. How would you like to participate in sharing what is important to you and other families about your home and help MPHA plan for the future of public housing?

# Visit the tables for more information.



Learn more about Section 18.  
Tell us what you like or dislike about your home.



Discuss outstanding & new work orders.



Interested in participating in a  
resident council?

Want to learn more about  
homeownership programs?

## **Application**

### **Section 7, Line 4**

#### **MPHA's consultation with the MPHA Resident Advisory Board**

MPHA staff presented on Section 18 to the RAB at its regular meeting on January 23, 2019. RAB members received the same material provided to scattered site residents at the resident meetings. RAB members did not submit any written questions, but did ask questions verbally that MPHA staff addressed. These included:

- *Who are the investors?* MPHA clarified that (unlike RAD) we do not anticipate at this time that investors would be involved in financing scattered site work.
- *What are the funding streams?* MPHA explained how we anticipate the transition from tenant protection vouchers to project-based vouchers, and the impact this has upon our amount and stability of funding.
- *How will MPHA deal with budget cuts from HUD?* We explained that while MPHA subsidy would still be subject to Congressional funding, we hope that conversion through Section 18 will provide greater stability than the status quo.
- *What kind of conditions are the homes in now?* We explained that they are in a mix of conditions, and we were in the process of conducting an assessment to gain full details. We know that many need considerable work, and this program could enhance our ability to do that.
- *Are we looking at partnerships around energy?* MPHA explained that we will be looking for technologies and sources of funding to help us make the scattered sites more energy efficient.
- *Is there any chance someone could come in and claim that this means the properties are being sold or privatized?* MPHA explained our plan uses HUD's disposition process under Section 18 to transfer the properties to a nonprofit wholly controlled by the housing authority. We explained that our application is not proposing to sell the properties, give control to other entities, or have the properties deviate from their mission to serve low-income families.



**Application**

**Section 7, Line 3**

**MPHA consultation with the PHA Jurisdiction Wide Resident Council**

The Minneapolis Public Housing Authority (MPHA) currently does not have a jurisdiction-wide Resident Council.

The information collection requirements contained in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2577-0075. There is no personal information contained in this application. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when disclosure is not required. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

**Section 1. Demolition**

1. Does the removal action include the demolition of all or a portion of a development (AMP) or other public housing property?

☐ Yes ☐ No

If yes:

- ☐ All units at a development site  
☐ A portion of units at a development site  
☐ Non-dwelling property at a development site  
☐ Non-dwelling property not at a development site (e.g. central PHA administrative building)

*If yes, complete questions 2-6 of this section. If no, move on to section 2.*

2. What is the estimated demolition cost?

\$

3. What is the anticipated source of funds for the demolition cost?

- ☐ Capital Funds ☐ CDBG  
☐ Operating Funds  
☐ Fiscal Year: \_\_\_\_\_  
☐ Non-Public Housing Funds (describe: \_\_\_\_\_)

4. What is the justification for the demolition?

- ☐ Obsolete - Physical Condition  
☐ Obsolete - Location  
☐ Obsolete - Other Factors  
☐ De Minimis Demolition (the lesser of 5 units or 5 percent of the total public housing units in any 5-year period)

*Attach a narrative statement describing the justification for demolition, along with other supporting documentation, in accordance with 24 CFR part 970 and PIH Notice 2018-04 (or any successor notice). If the demolition is for a portion of a development, the narrative statement must specifically address how the demolition will help to ensure the viability of the remaining portion of the development.*

5. Cost-test:

The PHA must certify and present supporting evidence that no reasonable program of modifications is cost-effective to return the public housing development (or portion thereof) to useful life.

*Attach a completed HUD-52860-B, narrative statement, and other supporting documentation as described in the instructions*

<b>Section 2. Disposition</b>	
1. What is the justification for the disposition?	<input type="checkbox"/> Conditions in Surrounding Area: 24 CFR 970.17(a) <input type="checkbox"/> Health and/or Safety <input type="checkbox"/> Infeasible Operation <input type="checkbox"/> More Efficient/Effective Low-Income Housing: 24 CFR 970.17(b) <input type="checkbox"/> Best Interests of PHA and Residents & Consistent with PHA Plan & 1937 Act: 970.17(c) <input type="checkbox"/> The Non-Dwelling Structure or Land Exceeds the Needs of the Development (after Date of Full Availability "DOFA") <input type="checkbox"/> The Disposition of the Non-Dwelling Property is Incidental to, or does not Interfere with, the Continued Operation of the Remainder of the Development
<i>Attach a narrative statement describing the justification for disposition, along with other supporting documentation, in accordance with 24 CFR part 970 and PIH Notice 2018-04(or any successor notice).</i> <i>If disposition is based on physical obsolescence under the demolition criteria, complete Section 1 (Demolition) of this form.</i>	
2. Method of Disposition	a. <input type="checkbox"/> Public Bid FMV Sale b. <input type="checkbox"/> Negotiated Sale at FMV c. <input type="checkbox"/> Negotiated Lease or other Transfer at FMV d. <input type="checkbox"/> Negotiated Sale or other Transfer at FMV e. <input type="checkbox"/> Negotiated Sale at below FMV f. <input type="checkbox"/> Negotiated Lease or other Transfer at below FMV g. <input type="checkbox"/> Land-Swap
<i>Attach a description of the method of disposition (e.g. sale or ground lease terms; below FMV disposition).</i> <i>If the disposition is proposed via negotiation, attach a Certificate of Good Standing (under applicable State law) of the proposed acquiring entity, or other evidence that the entity is recognized under State law.</i>	
3. Is the proposed acquiring entity the PHA's instrumentality as defined by 24 CFR 905.604(b)(3)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Commensurate Public Benefit: If the method of disposition is at or below FMV, the PHA must demonstrate a commensurate public benefit <i>Attach a narrative description of commensurate public benefit in accordance with 24 CFR 970.19 and PIH Notice 2018-04 (or any successor notice).</i>	

<b>Section 3. Proceeds</b>	
1. Will the PHA realize proceeds from this disposition?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. If PHA answered yes to question #1, indicate the estimated amount of gross and net proceeds	<div style="display: flex; justify-content: space-between;"> <span>Gross \$</span> <span>Net \$</span> </div>
3. Is the PHA requesting to use gross proceeds for relocation costs?	<input type="checkbox"/> Yes    \$                      (estimated amount) <input type="checkbox"/> No
4. Is the PHA requesting to use gross proceeds for reasonable costs of disposition?	<input type="checkbox"/> Yes    \$                      (estimated amount) <input type="checkbox"/> No
<i>If yes, attach a brief narrative, budget, or other supporting documentation describing the reasonable costs</i>	
5. If the PHA will realize net proceeds from this disposition, how does the PHA propose to use the proceeds?	<input type="checkbox"/> Public Housing Capital Fund (CFP) Uses <input type="checkbox"/> Loan for development of Public Housing Units <input type="checkbox"/> Section 8 PBV Unit Development <input type="checkbox"/> Loan for development of PBV units <input type="checkbox"/> Supportive Services for Residents <input type="checkbox"/> Costs of Converting Public Housing Units to Project-Based Section 8 under the Rental Assistance Demonstration (RAD) Program <input type="checkbox"/> Section 8 HCV Shortfalls <input type="checkbox"/> Operation of Section 8 program <input type="checkbox"/> Operation of Public Housing program <input type="checkbox"/> Modernization of Section 8 Units <input type="checkbox"/> Loan for modernization of PBV Units <input type="checkbox"/> Other Statutorily Eligible Uses:                      (describe) <input type="checkbox"/> To Be Determined (TBD) (PHA must request approval from HUD when it determines a proposed use)
<i>Attach a brief narrative, budget, or other supporting documentation describing the proposed use of proceeds.</i> <i>If loan is checked, include the loan term, interest rate, and type (i.e. permanent, bridge, construction).</i>	

**Section 4. Offer of Sale to Resident Organization (Disposition Only)**

1. If this action is for a disposition, is the PHA exercising any of the exceptions to the offer of sale requirements?

- ☐ Yes ☐ No
- ☐ 970.9(b)(3)(i): local government requests to acquire vacant land less than 2 acres in order to build or expand public services
- ☐ 970.9(b)(3)(ii): PHA seeks disposition to develop a facility to benefit low-income families
- ☐ 970.9(b)(3)(iii): the units have been legally vacated (HOPE VI, 24 CFR part 971 or 972)
- ☐ 970.9(b)(3)(iv): the units are distressed units subject to Section 33 required conversion
- ☐ 970.9(b)(3)(v): property proposed for disposition is non-dwelling
- ☐ Other: PHA requests that HUD consider another exception to 970.9(b)(1)

*If exercising an exception, attach a narrative statement or documentation supporting the exception in accordance with 970.9(b)(4). If not exercising an exception, complete questions #2-6 of this Section 4.*

2. Name(s) of all established eligible organizations as defined by 24 CFR 970.11 (e.g. resident organizations, eligible resident management corporations as defined in 24 CFR part 964, and nonprofit organization acting on behalf of residents at a development.

*Attach a narrative explanation of how the PHA determined the entities identified*

3. Date(s) the PHA sent an initial written notification to each established eligible organization in accordance with 24 CFR 970.11

*Attach a copy of the initial written notification to each established eligible organization*

4. Did the PHA receive a written expression of interest in accordance with 24 CFR 970.11 by an established eligible organization?

☐ Yes ☐ No

*If yes, attach a copy of the expression of interest by any eligible established organization*

5. Did the PHA receive a proposal to purchase from an established eligible organization within 60-days of receiving the established eligible organization's expression of interest?

☐ Yes ☐ No

*If yes, attach a copy of the proposal to purchase from an established eligible organization*

6. Did the PHA accept the proposal to purchase?

☐ Yes ☐ No  
☐ N/A (PHA did not receive a proposal to purchase)

*Attach a narrative explanation of why the PHA accepted or rejected the proposal to purchase*

## Section 5. PHA Certification

### For SAC applications submitted under 24 CFR part 970:

- 1) If this SAC application includes a demolition action, I certify that the proposed development (units or other property) meets the obsolescence criteria of 24 CFR 970.15 as specifically described in this SAC application. I further certify that such obsolescence makes any units proposed for demolition unsuitable for housing purposes and that no reasonable program of modification is cost-effective to return the development to its useful life;
- 2) If this SAC application includes a demolition for only a portion of the buildings/units at a development on a contiguous site, the PHA certifies that the partial demolition will help to ensure the viability of the remaining portion of the development;
- 3) If this SAC application includes a disposition action for public housing units, the PHA is justified in disposing of the development or other public housing property in accordance with the specific criteria of 24 CFR 970.17, as specifically described in this SAC application;
- 4) The PHA will comply with all applicable relocation requirements of 24 CFR 970.21; and
- 5) The PHA will use gross and net proceeds it receives from the disposition in accordance with the requirements of 24 CFR 970.19 and the HUD approval.

### For De Minimis Demolitions:

- 1) The units proposed for demolition meet the criteria of Section 18 because they are beyond repair or the space occupied by the units will be used for meeting the service or other needs of public housing residents; and
- 2) The units proposed for demolition do not exceed the statutory maximums of five percent of my PHA's total housing stock, or five dwelling units, whichever is less, in any 5-year period.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	
Title	
Signature	
Date	

## **Form HUD-52860-A Instructions**

This form is required when a PHA proposes a demolition or disposition under 24 CFR part 970 and when a PHA proposes a de minimis demolition under Section 18 of the 1937 Act. This information is required as a supplement to the HUD-52860 form. PHAs must complete this form and upload it as an attachment to the IMS/PIC SAC application. Also, PHAs must upload the supporting documentation requested by this form as part of the IMS/PIC SAC application. PHAs must label that supporting documentation by section number of this form and/or by name (e.g. use of proceeds). PHAs refer to 24 CFR part 970 and all applicable PIH Notices in completing this form, including PIH Notice 2018-04 (or any successor notice). PHAs must label All defined terms not defined in this form have the meaning in those regulations and notices.

### **Section 1: Demolition**

Justification (Question 4). In completing their narrative statements describing the justification for demolition, PHAs should refer to the guidance at 24 CFR part 970 and PIH Notice 2012-7 (or any successor notice). In the case of a SAC application for demolition of portion of a development (e.g. SAC application is for less than all units on a contiguous site) the PHA's narrative must describe how the demolition will help to ensure the viability of the remaining portion of the development. This requirement shall not apply for demolitions of units on scattered non-contiguous sites.

Obsolete-Physical Condition: 24 CFR 970.15(b)(1)(i). A PHA must demonstrate serious and substantial physical deterioration of the buildings/units at the development. HUD strongly encourages PHAs to submit a physical needs assessment (PNA), government inspection, or independent architect or engineer's report as supporting documentation.

Obsolete-Location: 24 CFR 970.15(b)(1)(ii). A PHA must demonstrate that the location of the units causes obsolescence. HUD may consider the physical deterioration of the neighborhood; change in neighborhood from residential to industrial or commercial development; or environmental conditions which jeopardize the suitability of the site or a portion of the site and its housing structures for residential use.

Obsolete-Other Factors: 24 CFR 970.15(b)(1)(iii). A PHA must generally demonstrate that factors at the development have impacted the marketability, usefulness, or management of the units so seriously that, notwithstanding due diligence and its best efforts in marketing and leasing the units, the PHA is unable to operate the development for residential purposes for an extended period of time (generally more than 5 years). HUD may consider factors such as turnover rate, historic vacancy rate, access to transportation, crime rates, site plan and density issues, neighborhood infrastructure, and unit size. HUD strongly encourages PHAs to submit third party documentation.

De Minimis Demolition: 24 CFR 970.27. In any 5-year period, a PHA may demolish not more than the lesser of 5 dwelling units or 5 percent of the total public housing dwelling units owned by the PHA without the need to obtain HUD approval under 24 CFR part 970 provided the PHA can meet one of the following criteria: (a) The PHA will use the space occupied by the unit(s) for meeting the service or other needs of the residents (e.g. laundry facility; community center; child care center); or (b) the PHA has determined the unit(s) are beyond repair.

Cost-Test (Question 5). HUD generally shall not consider a program of modifications to be cost-effective if the costs of such program exceed 62.5 percent of total development cost (TDC) for elevator structures and 57.14 percent of TDC for all other types of structures in effect at the time the SAC application is submitted to HUD.

Obsolete-Physical Condition: 24 CFR 970.15(b)(1)(i). PHAs must complete and submit the HUD-52860-B form.

Obsolete-Location: 24 CFR 970.15(b)(1)(ii). HUD will consider the PHA's cost of curing the cause of the obsolescence (e.g. nearby industrial or commercial development, environmental conditions).

Obsolete-Other Factors: 24 CFR 970.15(b)(1)(i)(iii). HUD will consider the PHA's cost of curing the cause of the obsolescence (e.g. site plan, crime, turnover).

De Minimis Demolition. Cost-test requirements are not applicable.

### **Section 2: Disposition**

Justification (Question 1). In completing their narrative statements describing the justification for disposition, PHAs should refer to the guidance at 24 CFR part 970 and PIH Notice 2018-04 (or any successor notice).

Conditions in Surrounding Area: 24 CFR 970.17(a). A PHA must demonstrate the location of the units (e.g. industrial or commercial development) jeopardizes the health and/or safety of the residents and/or the feasible operation of the units by the PHA based on external conditions outside the control of the PHA; and the condition is beyond the scope of the PHA to mitigate or cure in a cost-effective manner. To support a SAC application based on health and/or safety, PHAs must generally provide relevant third-party documentation that evidences the external conditions that present serious obstacles to the PHA maintaining the units as healthy and/or safe housing.

More Efficient/Effective Low-Income Housing: 24 CFR 970.17(b). A PHA must demonstrate the retention of the units is not in the best interests of the residents or the PHA because the disposition allows the acquisition, development, or rehabilitation of units that will be more efficiently or effectively operated as other low-income housing units. PHAs must generally demonstrate why other low-income units are preferable (e.g., more energy efficient, better unit configuration, better location for resident in terms of transportation, jobs, schools or racial or economic concentration). See PIH Notice 2012-7 (or any successor notice).

Best Interests of PHA and Residents & Consistent with PHA Plan & 1937 Act: 970.17(c). See PIH Notice 2018-04 (or any successor notice).

Third-Party Agreement. Certain third-party agreements may require HUD review and approval under 24 CFR part 970. In this case, the PHA must submit a SAC disposition application under this form to obtain HUD approval for the third-party agreement (including completing and attaching justification narrative of the agreement under 970.17(c) or other applicable section of 24 CFR 970). In the SAC application, the PHA must clearly indicate it is requesting HUD approval of a third-party agreement and attach the draft form of third-party agreement to the application. If the PHA is not requesting that HUD release the ACC or Declaration of Trust (DOT) or DORC from the property, it should put “0” in all fields for units, buildings and acreage. See PIH Notice 2018-04 (or any successor notice).

Non-Dwelling Property: 970.17(d). A PHA must demonstrate that the non-dwelling structure or land exceeds the needs of the development (after DOFA); or the disposition is incidental to, or does not interfere with, the continued operation of the remainder of the development.

Method of Disposition (Question 2). In completing this section, PHAs should refer to the guidance at 24 CFR part 970 and PIH Notice 2018-04 (or any successor notice). PHAs may propose different methods of disposition in their SAC applications, including:

- (a) Public Bid Fair Market Value (FMV) Sale (Cash). The PHA lists the public housing property on the open and competitive market and solicits bids. Actual FMV may be more or less than the appraised value, depending on the market and may reflect negotiations during the due diligence period.
- (b) Negotiated Sale at FMV (Cash). The PHA negotiates a sale with an identified buyer based on the appraised value of the public housing property. The PHA receives cash for the sale.
- (c) Negotiated Lease or other Transfer at FMV (Cash). The PHA negotiates a lease (e.g. ground lease, capital lease) with an identified entity based on the appraised value (leasehold and/or fee value) of the public housing property. The PHA receives cash for the lease payments.
- (d) Negotiated Sale or other Transfer at FMV (Seller-Financing). The PHA negotiates a sale with an identified buyer but instead of receiving cash proceeds, the PHA receives a promissory note and/or mortgage or deed of trust. Payments are generally made from deferred loan payments.
- (e) Negotiated Sale at below FMV. The PHA negotiates a sale with an identified buyer for below FMV (often nominal value).
- (f) Negotiated Lease or other Transfer at below FMV. The PHA negotiates a lease with an identified entity for below FMV (often nominal value).
- (g) Land-Swaps. The PHA negotiates a “land swap”. In addition to meeting the requirements for a Negotiated Sale at FMV in B above, the PHA must generally evidence that HUD has approved the acquisition of the property to be acquired in the “land-swap” under 24 CFR part 905. If the property that PHA is proposing to acquire is valued less than public housing property proposed for disposition, the PHA receives cash proceeds to make up the difference.

If the disposition is proposed via negotiation, the PHA must evidence the entity is a valid entity under State law and is in good standing.

Commensurate Public Benefit (Question 3). In completing this section, PHAs should refer to the guidance at 24 CFR 970.19 and PIH Notice 2018-04 (or any successor notice). HUD determines commensurate public benefit on a case-by-case basis. However, generally the public housing property must be developed for affordable housing purposes serving low-income families (incomes at or below 80% of area median). HUD does not consider general public benefits (e.g., schools, libraries, fire stations, police stations and bridges) to be approvable non-dwelling uses that primarily serve low-income families. A PHA may propose a preferred form of use restriction (e.g., LIHTC extended use agreement, HOME agreement, reversion clause in transfer documents, provision in ground lease, separate use agreement).

If applicable, PHAs may, but are not required, to complete the following table and submit with their SAC applications in order to evidence the proposed commensurate public benefit, purpose and other disposition details:

<b>Development Name</b> Scattered Sites <b>Development Number</b> MN002000002				
<b>Proposed for Disposition:</b> Building/s: 648 , Units: 736 , Acres: 106.1				
Total number of units to be developed (or preserved) on property:	Less than 80% of Area Median Income			
Total number of non-dwelling buildings to be developed (or preserved) on property:	ACC	Non-ACC	PBV	Market Rate
Rental				
For Sale				
Name of Acquiring Entity (Rental Units)				
Name of Acquiring Entity (initial developer) (For Sale Units)				
Method of Disposition	Fee simple transfer at below market value			
Lease Price	\$ per year			
Sale Price	\$			
Purpose and or summary of Commensurate Public Benefit (short description of units and non-dwelling property to be developed/preserved)				

### Section 3: Proceeds

In completing this section, PHAs should refer to the guidance at 24 CFR part 970, PIH Notice 2018-04 (or any successor notice) and any other HUD guidance on proceeds. In accordance with 24 CFR 970.19, PHAs describe their proposed use of estimated proceeds (gross and net) in the SAC application.

Relocation Costs (Question 3). Pursuant to 24 CFR 970.21(e)(2), PHAs must pay for the actual and reasonable relocation expenses for all residents who will be displaced from their public housing units as a result of a demolition and/or disposition action. HUD considers the following to be eligible costs of relocation that can be deducted from gross proceeds: counseling and advisory services to residents (including mobility counseling), moving expenses (including housing search costs), payment of a security and/or utility deposits at a comparable housing, and costs of providing any necessary reasonable accommodations to residents in accordance with Section 504 of the Rehabilitation Act of 1973 and other HUD guidance.

Reasonable Costs of Disposition (Question 4). Reasonable costs of disposition may include the following (although HUD may disapprove any costs it deems unreasonable): (i) costs that PHAs incur in preparing the SAC application (e.g. environmental studies, engineering costs of rehab estimates under 24 CFR 970.15, appraisal fees); and (ii) transactional (seller) closing costs (e.g., local customary split of any brokerage fees, appraisal fees, survey costs, tax certificates fees, fees for recording the DOT/DORC release, notary fees, title insurance fees, title company document preparation and closing fees, mailing and wire transfer fees, and reasonable attorney fees), provided such costs are listed on the HUD-1 or other applicable settlement statement document.

Net Proceeds (Question 5). Net proceeds means proceeds realized after deducting relocation and disposition costs.

### Section 4: Offer of Sale to Resident Organizations

In completing this section, PHAs should refer to the guidance at 24 CFR part 970 and PIH Notice 2018-04 (or any successor notice). PHAs are eligible to exercise the exception from the offer of sale described at 970.9(b)(3)(ii) only in cases where the PHA has firm plans to replace substantially all of the units proposed for disposition with the housing units for low-income families (even if those housing units are not low-income housing units as defined by Section 3 of the 1937 Act). Note that a PHA cannot forgo giving applicable resident entities an offer of sale based on speculation or general plans to build a facility to benefit low-income families.

### Section 5: Certification

The Executive Director, Board Chairperson, or other authorized agent of the PHA, should sign and date this Certification.



## Addendum

### Section 1, Line 4

#### Scattered Sites Section 18 Justification for Disposition

Minneapolis Public Housing Authority owns and operates 736 scattered site housing units in 648 properties spread over the 58.2 square miles of Minneapolis.

Of the 648 properties, 573 are single-family homes, 70 are duplexes, three are four-plexes, one is a five-unit row-house, one is a six-unit building, and one property is made up of eight units - three duplexes and two single family homes. The five-unit row-house, the six-unit building, and eight-unit property are included in this Section 18 disposition application. These three properties do not qualify as scattered sites for purposes of Notice PIH 2018-04 unless HUD is willing to disregard the language limiting “scattered sites” to no more than four contiguous units. The properties, however, are similar to the rest of MPHA’s scattered sites portfolio in that they have unmet capital needs, lack uniformity of systems, and have operational inefficiencies due to being spread across the city.

The scattered site properties represent a variety of heating and cooling technologies, architectural styles, and construction techniques. 230 of the 648 properties were constructed prior to World War II. The average age of the properties is 71 years.

**Figure 1: Images of different scattered sites representing the variety of building types and eras of construction**



Year built: 1990



1954



1902



1968



1924



1905

#### Capital Shortfall

In 2014 MPHA worked with the Inspections Group and Ameresco to complete an extrapolated sample physical needs assessment of the scattered site portfolio. The 736 units in the portfolio were sorted into groupings based on similarities including year built, stories, size, and building type. Ten percent of the portfolio was audited to include representative properties from each of the groupings. The capital needs for the audited properties were extrapolated to each property in that grouping based on assumptions related to building systems, materials, construction types, and finishes. Life cycle estimates were developed utilizing Fannie Mae Estimated Useful Life tables and replacement costs were established around RS Means standards for this geographical area, as well as the professional judgment of these two industry leaders. The replacement costs are adjusted annually to reflect price escalation.

The scattered site portfolio has an estimated \$28 million in unmet capital needs in 2018. This includes repairs and replacements that have been identified by the Inspections Group and Ameresco for replacement in 2018 or in previous years. Over the next five years there is an additional \$16 million in estimated capital needs.

The cost to address both the backlog of capital needs and anticipated future needs is substantially greater than the vastly insufficient Public Housing Capital Fund can cover. Simply addressing the capital needs of our scattered site portfolio would consume 100 percent of MPHA's expected capital fund allocation for the next five years- not leaving any capital funding for the 5,000+ housing units in the 42 high-rise buildings and 184 low-rise units owned and operated by MPHA, which also have \$110 million in unmet capital needs. If MPHA dedicated a pro rata share of its capital grant to scattered sites based on the number of units relative to all MPHA-owned units, approximately \$1.8 million of its 2018 grant would be dedicated to capital improvements at these properties. Even at the historically high appropriations levels of 2018, this would only address 6% of the current unmet need.

#### Operational challenges

The 736 units are spread across 58.2 square miles of Minneapolis. The distance needed to travel between units leads to lost employee time. Sixty-five percent of the scattered sites are four or more miles from the property management office as the crow flies. However, the driving distance between the office and many of the scattered sites is over eight miles. The lack of uniformity in the systems across these properties makes them challenging to operate as well. Additionally, each has unique capital needs that differ from property to property, making it costly to reach any economies of scale.

MPHA is committed to our mission to promote and deliver quality, well-managed housing to a diverse, low-income population across Minneapolis; many of these units are in relatively low-poverty opportunity areas. Moreover, their preservation is particularly important because apart from the 184-unit low-rise development, they constitute Minneapolis' only public housing principally for non-elderly families.

#### Need for and likely success of preservation

While the continuation of the scattered sites as public housing is unsustainable for the reasons discussed, the proposed disposition to a nonprofit owned and operated by the MPHA, along with continued operation under the project-based voucher platform will provide a higher and more reliable subsidy stream. As a result, MPHA will be able to preserve these units for the low-income families we serve. A Use Restriction/Agreement of 30 years will be applied to the properties, thus continuing the affordability of the units for at least the next 30 years. The properties will continue to provide homes to families with similar income levels as those housed there today.

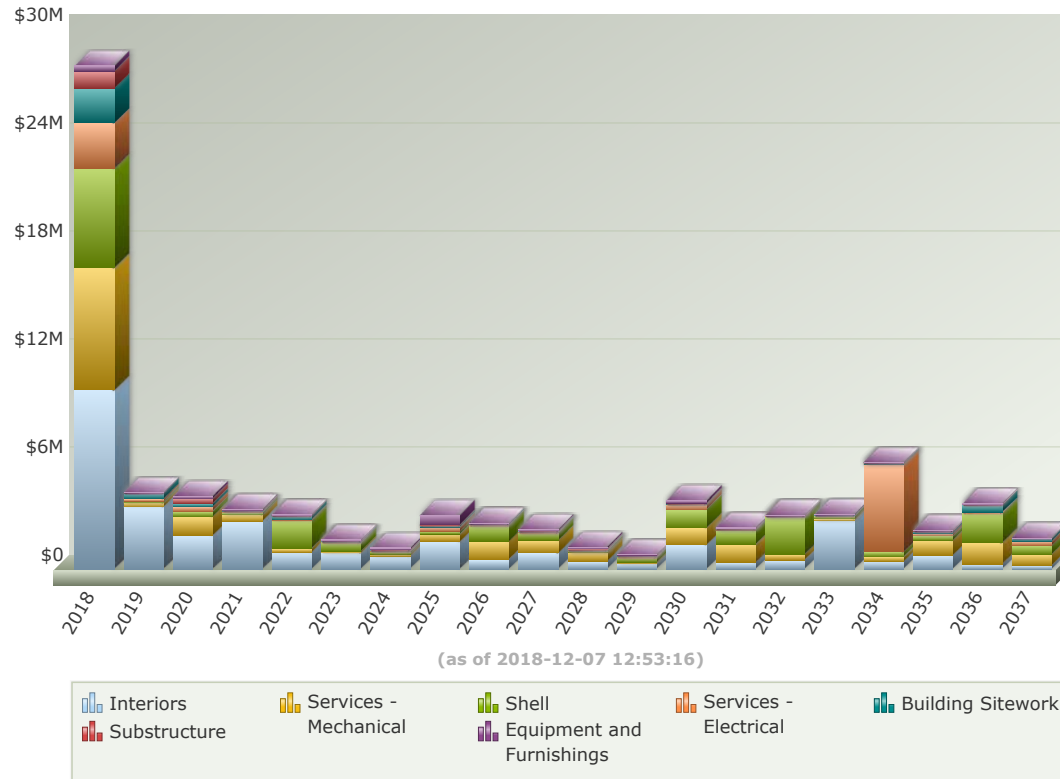


## MINNEAPOLIS PUBLIC HOUSING AUTHORITY



### Cost by Discipline

Years 2018 - 2037 and where Facility Status = Active for Portfolio Minneapolis Public Housing Authority for AMP MN002000002 and where Development = Scattered Sites

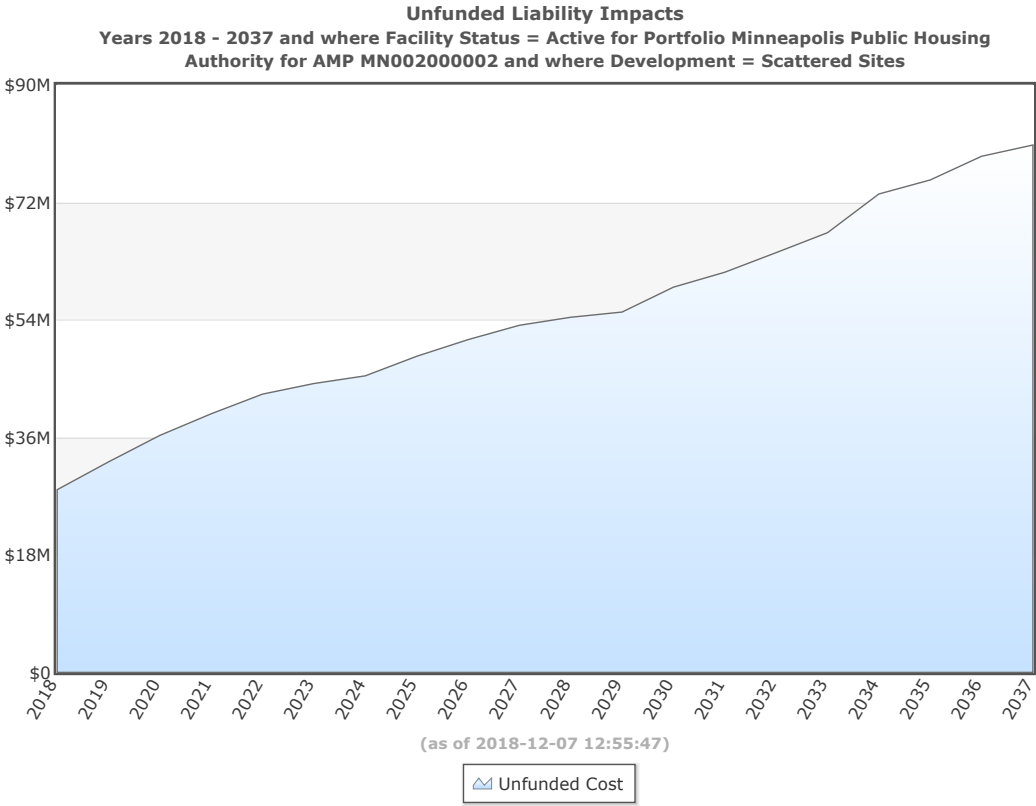


### Cost by Discipline Years 2018 - 2037 and where Facility Status = Active for Portfolio Minneapolis Public Housing Authority for AMP MN002000002 and where Development = Scattered Sites

Discipline	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
Interiors	\$9,962,736	\$3,454,249	\$1,880,723	\$2,651,924	\$931,708	\$896,858	\$712,011	\$1,538,608	\$522,793	\$901,210	\$442,254	\$312,198	\$1,346,005	\$381,437	\$496,961	\$2,700,517	\$439,555	\$774,208	\$279,378	\$211,049
Services - Mechanical	\$6,771,245	\$239,928	\$1,034,344	\$368,240	\$211,055	\$100,359	\$125,423	\$410,527	\$1,026,729	\$707,105	\$497,434	\$80,526	\$945,202	\$1,006,035	\$324,095	\$86,499	\$246,383	\$821,679	\$1,200,387	\$606,309
Shell	\$5,533,644	\$89,884	\$292,144	\$120,671	\$1,583,770	\$511,803	\$165,542	\$155,743	\$899,721	\$451,044	\$117,002	\$288,469	\$1,008,940	\$775,985	\$2,115,776	\$171,229	\$294,179	\$252,311	\$1,661,725	\$492,524
Services - Electrical	\$2,528,989	\$118,007	\$256,558	\$73,118	\$19,120	\$7,755	\$16,447	\$222,505	\$4,958	\$9,092	\$10,882	\$17,055	\$306,082	\$72,044	\$28,459	\$27,996	\$4,849,352	\$134,365	\$3,681	\$244,923
Building Sitework	\$1,927,544	\$333,863	\$190,194	\$34,325	\$240,711	\$69,979	\$58,767	\$116,004	\$78,642	\$50,541	\$35,091	\$60,459	\$39,798	\$4,118	\$19,226	\$30,876	\$70,756	\$127,867	\$441,034	\$164,751
Substructure	\$947,617	\$0	\$264,087	\$22,158	\$10,806	\$16,509	\$8,798	\$21,239	\$11,626	\$9,772	\$23,143	\$22,592	\$24,881	\$15,574	\$7,949	\$0	\$9,775	\$29,483	\$8,366	\$0
Equipment and Furnishings	\$299,642	\$24,596	\$142,114	\$40,494	\$13,656	\$17,360	\$89,305	\$527,718	\$4,937	\$71,123	\$100,641	\$19,549	\$139,598	\$31,123	\$8,149	\$34,970	\$19,913	\$7,663	\$32,550	\$6,165



MINNEAPOLIS PUBLIC HOUSING AUTHORITY



Unfunded Liability Impacts Years 2018 - 2037 and where Facility Status = Active for Portfolio Minneapolis Public Housing Authority for AMP MN002000002 and where Development = Scattered Sites																				
Year	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
Cost	\$27,971,416	\$4,260,527	\$4,060,163	\$3,310,931	\$3,010,826	\$1,620,623	\$1,176,293	\$2,992,343	\$2,549,406	\$2,199,887	\$1,226,446	\$800,846	\$3,810,505	\$2,286,315	\$3,000,615	\$3,052,086	\$5,929,913	\$2,147,576	\$3,627,120	\$1,725,721
Unfunded Cost	\$27,971,416	\$32,231,942	\$36,292,105	\$39,603,036	\$42,613,862	\$44,234,485	\$45,410,779	\$48,403,122	\$50,952,528	\$53,152,415	\$54,378,861	\$55,179,707	\$58,990,213	\$61,276,528	\$64,277,143	\$67,329,228	\$73,259,141	\$75,406,717	\$79,033,837	\$80,759,558

**Addendum (Form 52860-A)**

**Section 2, Line 2 and Line 4**

**Method of Disposition / Commensurate Public Benefit**

Minneapolis Public Housing Authority (MPHA) will be disposing the scattered site properties identified in the application to MPHA's instrumentality, Community Housing Resources (CHR), a Minnesota nonprofit corporation. They will be a sale below Fair Market Value (FMV) at a nominal price of \$1 per property. The scattered site housing units comprise the majority of the MPHA's deeply affordable housing for families in the city. They offer a unique opportunity for families in public housing to integrate seamlessly into their surrounding neighborhoods, and often serve as a training ground for future homeownership. Thus, CHR will continue to preserve these homes to ensure continued affordable housing options for families across Minneapolis. The Certificate of Good Standing is attached.

As discussed in the Addendum Section 2, Line 1, the disposition would result in the preservation of this valuable low- income housing resource that would not continue to be viable as public housing. About half of these units are in relatively low-poverty areas and can serve as a particularly positive resource to advance residents' economic opportunities. Rehabilitation and investment into the properties that are in areas of concentrated poverty could bring opportunity to those areas and revitalize the neighborhoods for the families living there. To further ensure that these intended results occur, the units will have a use restriction for 30 years, per an agreement with HUD, and the HAP contract will require renewal.

**Office of the Minnesota Secretary of State  
Certificate of Good Standing**

I, Steve Simon, Secretary of State of Minnesota, do certify that: The business entity listed below was filed pursuant to the Minnesota Chapter listed below with the Office of the Secretary of State on the date listed below and that this business entity is registered to do business and is in good standing at the time this certificate is issued.

Name:	Community Housing Resources
Date Filed:	06/18/2001
File Number:	1X-735
Minnesota Statutes, Chapter:	317A
Home Jurisdiction:	Minnesota

This certificate has been issued on: 02/05/2019



*Steve Simon*

Steve Simon  
Secretary of State  
State of Minnesota

**Addendum****Section 4, Line 1****Exception to Offer For Sale to Resident Organization**

The applicable exception is that the PHA seeks disposition to develop a facility to benefit low-income families, because the new MPHA-related owner will preserve the units disposed of by attaching long-term Project-Based Vouchers (PBV) contracts. This will provide a more viable and stable long-term funding platform for the units. The units will have a use restriction for 30 years per agreement with HUD and the HAP contract will require further renewal.