

# THE NSP SUBSTANTIAL AMENDMENT

<p>Jurisdiction(s): City of Chicago, IL <i>(identify lead entity in case of joint agreements)</i></p> <p>Jurisdiction Web Address: www.cityofchicago.org/housing</p> <ul style="list-style-type: none"> <li>• <i>(URL where NSP Substantial Amendment materials are posted)</i></li> </ul>	<p>NSP Contact Person: Katie Ludwig Address: 33 N. LaSalle, 2<sup>nd</sup> floor Telephone: 312-742-0552 Fax: 312-742-1313 Email: katie.ludwig@cityofchicago.org</p>
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## **A. AREAS OF GREATEST NEED**

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

### Response:

During the public comment period, the City of Chicago received several comments encouraging the City to include communities in the North and Northwest regions in the areas of greatest need. Based on these comments, the City has revised its categorization of its areas of greatest need. Rather than listing regions of the City, the City has listed specific community areas as its areas of greatest need.

The City of Chicago has identified 25 out of a total of 77 community areas as areas of greatest need.<sup>1</sup> These 25 community areas identified as NSP areas of greatest need are listed below. The region that each community area falls into is listed next to it.

### Chicago Community Areas Identified as NSP Areas of Greatest Need

Auburn Gresham (South)	Oakland (South)
Austin (West)	Pullman (Far South)
Burnside (South)	Riverdale (Far South)
Chatham (South)	Roseland (Far South)
Chicago Lawn (Southwest)	South Chicago (South)
East Garfield Park (West)	South Deering (Far South)
Englewood (South)	South Shore (South)
Fuller Park (South)	Washington Park (South)
Grand Boulevard (South)	West Englewood (South)
Greater Grand Crossing (South)	West Garfield Park (West)
Humboldt Park (West)	West Pullman (Far South)
New City (South)	Woodlawn (South)
North Lawndale (West)	

<sup>1</sup> The City of Chicago’s community area boundaries are based on census tract boundaries.

These community areas were identified pursuant to Section 2301(c)(2) of the Housing and Economic Recovery Act of 2008 (HERA). These areas of greatest need are those community areas: (1) with the greatest percentage of home foreclosures; (2) with the highest percentage of homes financed by subprime mortgage related loans; and (3) identified as likely to face a significant rise in the rate of home foreclosures.

The City of Chicago analyzed all 77 community areas using data obtained from various organizations, including the local non-profit Woodstock Institute, the Chicago Association of Realtors, and the Illinois Department of Employment Security. Data from local, county and state records informed the process. The data points we compared were: (1) foreclosures completed to become Real Estate Owned properties (REOs) per 1,000 mortgageable properties in the area, (2) percent of loans in each area that are high cost, and (3) risk factors for rising foreclosure rates, including current price compared to 8-year maximum and unemployment rates. The following table below shows data for each community area of the city on each of these data points. Community areas identified as areas of greatest need are highlighted.

Region	Community Area	REOs per 1,000 mortgageable properties (2007)*	Percent of all loans subprime (2006-07)	Drop in price from maximum 2000-2008 (single-family homes detached) (2008 – third quarter)**	Unemployment rate (2007)***
	<i>City of Chicago</i>	906.6	31.3%	NA	5.60%
North Region	Edgewater	4.5	17.0%	27.88%	3.50%
	Lakeview	2.2	9.0%	6.83%	1.40%
	Lincoln Park	0.8	7.4%	26.76%	1.40%
	Lincoln Square	2	16.1%	29.79%	3.20%
	North Center	1.4	11.3%	21.71%	2.60%
	Rogers Park	9.2	22.9%	18.57%	4.60%
	Uptown	4.4	11.1%	43.92%	3.60%
	West Ridge	7.2	29.1%	18.15%	3.10%
Central Region	Armour Square	1	9.5%	N/A	3.50%
	Bridgeport	2.1	20.3%	61.30%	4.60%
	Douglas	8.7	32.9%	45.85%	11.90%
	Loop	6.8	12.4%	N/A	1.40%
	Lower West Side	2.4	29.5%	45.57%	5.30%
	McKinley Park	1.9	27.3%	27.61%	5.10%
	Near North Side	4.3	11.8%	16.34%	2.90%
	Near South Side	10.1	13.2%	48.47%	5.40%
	Near West Side	6.1	13.4%	0.00%	7.80%
West Town	5.2	14.6%	9.35%	3.90%	

Region	Community Area	REOs per 1,000 mortgageable properties (2007)*	Percent of all loans subprime (2006-07)	Drop in price from maximum 2000-2008 (single-family homes detached) (2008 – third quarter)**	Unemployment rate (2007)***
South Region	Auburn Gresham	17.3	55.2%	36.77%	10.20%
	Avalon Park	12.6	50.8%	19.47%	4.90%
	Burnside	26.7	59.7%	78.77%	11.60%
	Calumet Heights	10	51.0%	49.59%	5.50%
	Chatham	11.8	54.6%	28.47%	7.60%
	Englewood	45.3	67.4%	82.08%	16.30%
	Fuller Park	33.8	70.1%	95.91%	11.00%
	Grand Boulevard	46.5	45.3%	41.48%	15.20%
	Greater Grand Crossing	25.5	58.1%	61.97%	11.30%
	Hyde Park	3.6	20.8%	47.52%	2.60%
	Kenwood	12.7	30.9%	29.65%	6.60%
	New City	23.5	53.2%	83.09%	8.80%
	Oakland	3.9	31.3%	68.65%	16.30%
	South Chicago	25	58.8%	73.33%	11.20%
	South Shore	23.4	51.8%	52.36%	9.20%
Washington Park	52.2	54.1%	0.00%	15.10%	
West Englewood	40.8	65.2%	82.95%	15.50%	
Woodlawn	41.4	50.6%	72.42%	11.40%	
Far South Region	Beverly	4.5	26.1%	11.98%	3.30%
	East Side	3.2	37.1%	12.38%	7.60%
	Hegewisch	3.9	31.4%	7.47%	4.70%
	Morgan Park	12.2	40.8%	36.47%	5.00%
	Mount Greenwood	0.9	19.8%	19.27%	2.50%
	Pullman	10.4	52.4%	61.23%	10.50%
	Riverdale	4.9	64.3%	77.36%	21.70%
	Roseland	22.9	58.1%	59.18%	10.40%
	South Deering	10.9	55.0%	20.36%	7.10%
	Washington Heights	13	51.7%	32.31%	7.80%
West Pullman	28.9	61.0%	64.55%	8.30%	
Southwest Region	Archer Heights	4.7	34.1%	19.97%	3.80%
	Ashburn	9.3	44.5%	32.63%	5.10%
	Brighton Park	5.6	38.8%	28.96%	6.80%
	Chicago Lawn	22.2	54.3%	59.43%	9.30%
	Clearing	4.1	27.5%	18.43%	2.90%
	Gage Park	7.8	43.9%	46.70%	6.30%
	Garfield Ridge	3.3	26.4%	20.18%	3.70%
	West Elsdon	3.8	34.6%	25.71%	4.20%
West Lawn	7.3	39.9%	28.75%	4.30%	
West Region	Austin	16.9	54.2%	43.88%	10.50%
	East Garfield Park	23.9	49.2%	83.12%	13.40%
	Humboldt Park	19.5	50.5%	62.71%	10.90%
	North Lawndale	24.2	53.2%	78.85%	16.20%
	South Lawndale	4.7	41.5%	55.71%	6.90%
West Garfield Park	38.9	60.5%	93.39%	12.80%	

Region	Community Area	REOs per 1,000 mortgageable properties (2007)*	Percent of all loans subprime (2006-07)	Drop in price from maximum 2000-2008 (single-family homes detached) (2008 – third quarter)**	Unemployment rate (2007)***
Northwest Region	Albany Park	4.7	24.7%	30.83%	4.30%
	Avondale	4.1	26.8%	39.35%	5.30%
	Belmont Cragin	6.8	39.0%	35.04%	4.30%
	Dunning	4	24.5%	27.54%	2.80%
	Edison Park	0.7	13.8%	23.90%	2.10%
	Forest Glen	1.6	16.2%	16.97%	1.60%
	Hermosa	8.2	39.9%	39.25%	6.90%
	Irving Park	4.5	23.5%	24.55%	3.40%
	Jefferson Park	2.2	20.7%	20.26%	1.80%
	Logan Square	4.7	20.9%	5.07%	4.70%
	Montclare	7	31.4%	26.05%	3.80%
	North Park	2.2	23.9%	18.33%	2.50%
	Norwood Park	1.7	16.8%	18.13%	1.60%
	O'Hare	2.2	25.0%	30.56%	2.30%
Portage Park	3.8	26.8%	19.71%	2.80%	

\* Source: Woodstock Institute

\*\* Source: Multiple Listing Service (MLS) data from the Chicago Association of Realtors. Percent change is listed as Not Available (N/A) if more than 1/2 of the quarterly periods between 2000 and 2008 had no sales. Price is listed as zero if no sales were recorded in the third quarter of 2008.

\*\*\* Source: Illinois Department of Employment Security, Economic Information and Analysis: unpublished data. Labor Force estimates by Community Area, 2007 Annual averages, revised March 2008. Excludes residents living in group quarters.

The 25 community areas identified as areas of greatest need are those which fall into the top quartile of either REOs per 1,000 mortgageable properties or percent of subprime loans or those which fall into the top quartile of both the drop in price and unemployment rate. (Attached is a listing of the top quartile for each of the four data points.) We placed a greater emphasis on the REO and subprime data points because these are the best quantitative indicators of where the problem of vacant, foreclosed properties is currently having the most significant impact.

### ***B. DISTRIBUTION AND USES OF FUNDS***

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

#### Response:

The City of Chicago intends to designate one subgrantee that will administer its NSP grant. Responsibilities of this subgrantee will include: negotiating with banks for the discounted purchase of vacant foreclosed properties, holding and maintaining properties,

and working with a broad network of community development partners to dispose of properties. The City of Chicago has had discussions with Mercy Housing, Inc. about it serving in this capacity, and the subgrantee is expected to be a newly-created non-profit organization that will be sponsored by Mercy Housing, Inc. Going forward in this document, this entity will be referred to as the “Subgrantee.”

The City of Chicago, through its Subgrantee, will identify qualified community partners (which will be referred to in this document as “Participating Entities”) who have capacity to undertake the rehabilitation of acquired homes using a rolling application process. The City of Chicago and its Subgrantee will develop a set of objective criteria that all Participating Entities must meet, and the Participating Entities’ participation in the initiative will be commensurate with their experience in rehabilitating and redeveloping residential property.

Criteria for selecting Participating Entities will include previous residential development experience and the ability to leverage NSP funds to obtain private permanent financing. Entities with both single-family and multifamily development experience, as the City anticipates the Subgrantee will acquire single-family homes as well as 2-6 unit buildings. Developers with experience in both residential rehabilitation and new construction will be considered.

The City of Chicago, in conjunction with its Subgrantee, will identify “targeted zones” within the areas of greatest need identified in Part A. The City of Chicago will distribute funds among these targeted zones in the four areas of greatest need based on several factors.

One factor influencing the distribution of funds will be the concentration of vacant REO properties and the Subgrantee’s ability to negotiate discounted purchase prices to acquire a group of properties in a targeted zone. As a point of reference, the total value of residential properties that entered lending institutions’ REO portfolios in 2007 alone was \$1.2 billion. Thus, to make a measurable impact with our limited NSP funds, our efforts must be concentrated in targeted zones. Redeveloping one house on a block with ten vacant homes is unlikely to make a significant improvement in that neighborhood, but redeveloping a majority of those homes can make a difference. For this reason, we will focus our efforts in blocks where there is significant volume and where we can acquire a majority of the vacant properties.

Other criteria that will affect the decision of distributing funds among targeted zones include recent public and private investment in the surrounding area and the presence of community partners currently engaged in neighborhood stabilization initiatives.

### ***C. DEFINITIONS AND DESCRIPTIONS***

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

Response:

The Municipal Code of Chicago does not explicitly define “blight” or “blighted structure,” but Chapter 13-12-145 of the code defines a “public nuisance” as:

“(1) a building or structure found vacant and open after the effective date of an order to secure and enclose...within the previous 12 months...;

(2) a building or structure that contains any violation of health, fire, electrical, plumbing, building or zoning provision which is imminently dangerous or hazardous;

(3) a building or structure for which the costs of repairs necessary to bring the building or structure into compliance would exceed the market value...after the repairs would have been made, or when the owner cannot show that it has readily available and sufficient assets to make such repairs or where such repairs are otherwise economically infeasible;  
or

(4) a building or structure where a defendant has failed to comply with any order issued by a court...with respect to the building structure by the end the 60 day period following the date the order was issued or by such later date that is specified in the order.”

(2) Definition of “affordable rents.”

Response:

For NSP purposes, the City of Chicago will define “affordable rents” to be consistent with those mandated by the HOME program. As a current example, the 2008 maximum monthly affordable gross rents for 30% area median income (AMI), 50% AMI, 65% AMI, 80% AMI, and the HUD fair market rent for the Chicago-Naperville-Joliet HMFA are listed in the table below.

<b>2008 Maximum Monthly Affordable Gross Rents</b>					
Number of Bedrooms	30% AMI	50% AMI	65% AMI	80% AMI	HUD Fair Market Rent
0	\$396	\$660	\$838	\$1,055	\$734
1	\$424	\$708	\$899	\$1,131	\$840
2	\$509	\$848	\$1,081	\$1,356	\$944
3	\$588	\$980	\$1,240	\$1,568	\$1,154
4	\$656	\$1,093	\$1,364	\$1,749	\$1,304
5	\$724	\$1,206	\$1,486	\$1,929	\$1,500

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

Response:

The City of Chicago will ensure continued affordability for units assisted with NSP funds in a variety of ways, depending on a number of factors including tenure type (homeownership or rental).

For NSP-assisted rental units, the required affordability period will be consistent with the requirements of the HOME program:

Rental Housing Activity	Minimum Affordability Period
Rehabilitation or acquisition of existing housing per unit amount of investment: under \$15,000	5 years
\$15,000 to \$40,000 per unit investment	10 years
Over \$40,000 per unit investment or rehabilitation involving refinancing	15 years
New construction or acquisition of newly constructed housing	20 years

For NSP-assisted homeownership units, we will impose minimum affordability periods and resale/recapture provisions. These will also be consistent with the requirements of the HOME program.

The following HOME requirements for the period of affordability will apply to NSP-assisted homeownership units:

Amount of permanent per-unit subsidy	Minimum Affordability Period
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

In addition, we will require that a home sold during the affordability period must be sold at an affordable price to another income-qualified household (i.e., a household making no more than 120% of the area median income) and used as the homebuyer’s principal residence. If any of these conditions are not met, we will recapture a prorated amount of the homebuyer subsidy.

We expect to impose a lien to ensure compliance with the applicable affordability requirements.

In some neighborhoods, we may also choose to place homeownership units in the Chicago Community Land Trust (CCLT), which was created in 2006 to ensure long-term affordability for homeownership units built with City of Chicago assistance. Homes enrolled in the Community Land Trust benefit from substantial up-front subsidies to reduce the mortgage amount, as well as decreased taxes for a 99 year period. In exchange, the buyer signs a Deed Covenant agreeing only to resell the home within the 99-year period to income-qualified buyers. Original subsidies and remaining equity stay with the home upon sale, allowing proceeding income qualified buyers to receive the benefits inherent to the property.

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

Response:

At a minimum, the City of Chicago adheres to HUD Quality Standards (24 CFR, Subtitle B, Chapter IX, Part 982, Subpart I). In addition, rehabilitation standards must also adhere to all aspects the Municipal Code of Chicago, specifically Title 7 (Health and Safety) and 13 (Buildings and Construction).



***D. LOW INCOME TARGETING***

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

Response:

The City of Chicago will use at least \$13,809,504 (25% of its NSP allocation) to purchase and redevelop abandoned or foreclosed upon residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income.

***E. ACQUISITIONS & RELOCATION***

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

If so, include:

- The number of low- and moderate-income dwelling units—i.e.,  $\leq 80\%$  of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e.,  $\leq 120\%$  of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.

Response:

It is expected that after a thorough inspection, for some properties demolition will be the best option and most prudent use of NSP funds. Though the exact number will not be known until a full capital needs assessment has taken place, we expect approximately 100 dwelling units located in low- and moderate-income areas will be demolished as a result of NSP-assisted activities.

All units rehabilitated or constructed with NSP funds will be made available to households making no more than 120% of the area median income (AMI), with approximately 150 units being made available to households making no more than 50% AMI.

***F. PUBLIC COMMENT***

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

Response:

The public comment period was open from 6 p.m. on November 7, 2008 through 12 a.m. on November 23. The City of Chicago received a total of 22 comments during the public comment period. Comments are summarized in the table below.

	Date	Individual	Organization	Summary of Comments
1.	11/18/08	Anthony Oliver	Community Venture Investment Corporation	Mr. Oliver is a general contractor interested in opportunities resulting from the NSP. He supports the City's efforts in this endeavor.
2.	11/18/08		Westside Ministers Coalition	Westside Ministers Coalition agrees with the City's efforts as put forth in the NSP application and supports this request for federal funding.
3.	11/19/08	Wilfred Gadsen, Executive Director	Wardell Yotaghan Resident Management Corporation	Wardell Yotaghan Resident Management Corporation supports these efforts and requests that attention be given to West Side target areas. Gadsen is concerned funds will be used for CHA Plan for Transformation projects and, if so, urges the City to provide for full and open community participation in this process. Gadsen encourages the City to employ local residents to perform rehabs rather than pre-selected CHA and City contractors and recommends the City earmark funds for special needs housing. Gadsen suggests the City include additional target areas on the north side and target Housing Choice Voucher recipients for both rental and homeownership units.
4.	11/19/08	Donnie Brown, Executive Director	Genesis Housing Development Corporation	Mr. Brown's comments address the potential issues in identifying "bulk sellers." In addition, he requested clarification on whether long-term affordability will be required for all properties, whether Participating Entities would be able to acquire REOs directly from banks rather than going through the Subgrantee, on subsidy limits per unit, and how resale provisions will be monitored. Mr. Brown also suggested the City clarify how pre-existing programs will accompany these benefits, and whether financing opportunities will be below market rate levels.

	Date	Individual	Organization	Summary of Comments
5.	11/20/08	Brian White, Executive Director	Lakeside Community Development Corporation	Lakeside Community Development Corporation (LCDC) feels that the NSP application unfairly excludes north side communities from the target areas due to an increase in foreclosure filings since the start of 2007. In addition, would like to see “the City devote a higher percentage of NSP funds to the acquisition and rehab of homes for rental.” LCDC suggests that the AMI should be lowered to 30% AMI rather than 50%, and that the highest incomes served should be 80% AMI rather than 120% AMI.
6.	11/20/08	Raul Islas, Community Organizer	Latin United Community Housing Association (LUCHA)	LUCHA states that this strategy must integrate energy conservation, green technology, community participation, and locally controlled development. Furthermore, citing previous experiences, LUCHA understands that community participation will be fundamental to NSP success. In addition, NSP funds should integrate rental and ownership, education and counseling, job creation, leverage private resources, and provide financing that make rental affordable for those under 20% AMI.
7.	11/20/08	Valerie Leonard		Diversify ownership of properties among a broad base of investors. City should encourage churches, local community-based organizations, and entrepreneurs to purchase properties. City should coordinate the services of the departments of Housing, Planning and Development, Senior Services, Police, Human Services, the Mayor’s Office of Workforce Development, and the Mayor’s Office for People with Disabilities to implement this program holistically. If using TIF dollars, convene a local oversight panel to give advice on use of funds for NSP. City should host public meetings periodically informing the public of its progress.

	Date	Individual	Organization	Summary of Comments
8.	11/21/08	Angela Hurlock, Executive Director	Claretian Associates	Claretian Associates recommends stringent developer screening to avoid undermining community efforts to retain affordability and perpetuating gentrification. They suggest working with longstanding NPOs to carry out developments. They also suggest the City clarify policies on layering of resources with other NSP jurisdiction (i.e. state, county), including opportunities to combine properties for larger scale developments. Finally, they ask that the City clarify how communities can provide input for properties to be demolished.
9.	11/21/08	Heather A. Steans, Senator	Illinois State Senate	Senator Steans is concerned that the application does not include areas on the North and Far North sides of the City of Chicago. To support this concern Senator Steans cites data that indicates increased pre-foreclosure filings of 1600% in the past 24 months. In addition, Senator Steans refers to the many multi-unit condominium buildings are having trouble because the high number of foreclosed units are decreasing operating expenses.
10.	11/21/08	Katrina Van Valkenburgh, Director	Corporation for Supportive Housing	The Corporation for Supportive Housing (CSH) encourages the City to target at least 25% of NSP funds for supportive housing for those at or below 50% AMI. In addition CSH suggests the City use 25% of program income be reinvested in permanent supportive housing by 2013, use a portion of the 10% admin. fee to train developers, allow sufficient developers fees reserves, allow services to be funded from excess operating income, and to allow properties held in land banks to be temporarily used as rental properties.
11.	11/21/08	Paul Davis	Applegate & Thorne- Thomsen	Mr. Davis recommends that the City retain the option to address MF rental housing on vacant land as do other NSP recipients in Illinois.
12.	11/21/08	Yahya A. Karim, Executive Director	Roseland Community Development Corporation	Roseland CDC offers to work with the City in support of the NSP in select target areas that fall within their operating areas and offers three proposed redevelopment areas in Roseland: 111 <sup>th</sup> -115 <sup>th</sup> & State St.-King Dr., 107 <sup>th</sup> -115 <sup>th</sup> & State St.-Princeton, 119 <sup>th</sup> -123 <sup>rd</sup> & State St.-Halsted.

	Date	Individual	Organization	Summary of Comments
13.	11/21/08	Katherine E. Walz, Samatha Tuttle, and Wendy Pollack,	Sargent Shriver National Center on Poverty Law	Encourages the City to exceed the 25% minimum requirement to aid families and individuals who incomes do not exceed 50% AMI. City should coordinate NSP efforts with the Chicago Housing Authority planning process, including the use of project-based vouchers. Low Income Housing Tax Credits could be a source of additional financing for NSP rental housing developments. City should require and provide adequate NSP funding for energy efficient improvements. Any housing that is demolished should be replaced, particularly rental housing. If an occupied property is purchased, City should continue to house these individuals. Incorporate Section 3 compliance in NSP planning. Urges continued transparency and availability of information.
14.	11/21/08	Brian Freeman, Illinois Project Director	ACORN Housing Corporation of Illinois	NSP funds will make the most impact if funds are used to stabilize areas where the City already owns lots and the areas possesses a significant redevelopment potential. Lists the following blocks in which to focus NSP investment: 6200 and 6300 Honore, 6300 and 6400 Wood, 6200 and 6300 Marshfield, 6100 and 6300 Hermitage, 5000 Throop, 5000 and 51000 Carpenter, 5100 and 53000 Laflin, 52000 and 5300 May, 5000 and 5100 Aberdeen, 6000 Green, 6200 Carpenter, 6100 and 6200 Aberdeen.
15.	11/21/08	Nicholas Brunick	Applegate & Thorne- Thomsen	City should retain the option to use NSP funds in North and Northwest side neighborhoods. Expand the activity for new construction of homeownership units to include new construction of rental units.
16.	11/21/08	Caleb Sjoblom, Director	Rogers Park Community Development Corporation	North Side communities are being overlooked. City's proposal does not address the impact of "broken condos." NSP funds should be targeted to condo buildings that deteriorate as a result of foreclosures.

	Date	Individual	Organization	Summary of Comments
17.	11/21/08	Jeffrey E. Leslie and Daniel Rawner	The Edwin F. Mandel Legal Aid Clinic of the University of Chicago Law School	City should focus more of its NSP efforts on creating supportive housing. Establish a goal of using 40% of total NSP funds to benefit special-needs groups. Create a new program using 15% of NSP funds to develop supportive housing, including group homes and transitional housing.
18.	11/21/08	Rebecca McDannald	Metropolitan Tenants Organization	Priority should be purchase and rehabilitation of foreclosed and abandoned properties, as well as the redevelopment of demolished or vacant properties. At least 50% of funds should be targeted to benefit those who are at or below 50% AMI.
19.	11/22/08		Chicago Rehab Network	Chicago Rehab Network (CRN) states that the selection of qualified community partners as Participating Entities should prioritize nonprofit community organizations and developers. The City should increase the set-aside funding for those at or below 50% AMI from 25% to 40%. CRN also suggest the City examine lease to purchase models, a portion of administrative funds be set aside for unforeseen issues, and that special attention be given to the “layering of pre-existing” resources. When income qualifications conflict, the focus should remain on those who do not exceed 100% AMI. CRN also notes that property taxes should not negatively affect the affordability of rental buildings, and that all NSP reporting conform to pre-existing City quarterly reporting formats. CRN recommends the use of HOME CHDO funds to assist in labor costs to acquire, rehab, and manage properties. CRAN also recommends the development of guidelines to govern REO property appraisals.

	Date	Individual	Organization	Summary of Comments
20.	11/22/08	Mike Tomas, East Garfield Park Conservatory Alliance	Garfield Park Conservatory Alliance	East Garfield Park New Communities Program of the Garfield Park Conservatory Alliance would like to be involved in the selection of “Participating Entities” and in identifying “target zones” in the West Region. Require property management training for owners of multifamily buildings receiving NSP funds. Consider lease-to-own as a disposition option. All pre-approved developers should be required to work with at least one community-based organization in each targeted zone. Require pre-approved developers to partner with local developers and contractors. Develop and annual review process for the properties in the total portfolio to provide an opportunity for residents and local organizations to be aware of the activity focused on stabilizing their neighborhood.
21.	11/22/08	John McDermott, Housing & Land Use Director	Logan Square Neighborhood Association	The Logan Square Neighborhood Association urges the City to amend the NSP to include the northwest side of the City. In support of this request they cite and increase in foreclosure filings resulting bank owned properties.
22.	11/22/08	Deborah Robinson, Director	Northwest Austin Council	Northwest Austin Council recommend that a percentage of community businesses and residents participate in the rebuilding of the community, and that NSP allow for displaces residents to return to their homes with affordable loans or assistance with closing costs. They also suggest the City hold panel discussions with community organizations to discuss the process of the NSP. Finally, Northwest Austin Council asks the City to reconsider the definition of “affordable rents”, and involve community based organizations receive a published list or target properties in their community areas for review.

**G. NSP INFORMATION BY ACTIVITY**

The performance measures and budget amounts listed in Part G are estimates based on current market assumptions. We expect that we will revise these estimates as we move forward with implementing the Neighborhood Stabilization Program and are able to test our assumptions.

The performance measures and budgets listed here account for the City of Chicago's use of its \$55,238,017 allocation only. **These estimates do not include units that will be assisted with program income that we expect will be generated by this \$55.2 million investment.**



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

(1) Activity Name: Acquisition of Abandoned and Foreclosed Homes for Rehabilitation

(2) Activity Type: NSP eligible uses: (B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties. CDBG eligible activity: 24 CFR 570.201 (a) Acquisition.

(3) National Objective: LMMH (Low/Moderate/Middle Income Housing benefit): provides or improves permanent residential structures that will be occupied by a household whose income is at or below 120 percent of area median income.

(4) Activity Description: The City of Chicago, the Subgrantee, or a Participating Entity will acquire real estate owned (REO) properties that will be rehabilitated and then sold or rented to eligible households. Rehabilitation will bring the properties up to local building code standards and HUD Housing Quality Standards (HQS).

This activity will address all of our areas of greatest need, as all of these areas have vacant, foreclosed homes in need of rehabilitation. The benefit to low-, moderate- and middle-income households will be a housing benefit, and all of the homes acquired and rehabilitated will be purchased by or rented to households making no more than 120% of the area median income (AMI).

This activity will be used to meet the requirement that 25% of our NSP grant be used to assist households making no more than 50% AMI. Not all of the properties acquired will be sold or rented to households with incomes at or below 50% AMI, but many of the 2-6 unit buildings that will be rental, will serve households making 50% AMI or less.

(5) Location Description: Specific addresses of properties to be acquired for rehabilitation will be provided as they are identified. All properties will be located in the areas of greatest need, as described in Part A.

(6) Performance Measures: 425 units, 150 of which will serve households making no more than 50% AMI and 275 of which will serve households making 51-120% AMI

(7) Total Budget:

NSP Funds: \$26,562,500

(8) Responsible Organization: The City of Chicago, the Subgrantee, or Participating Entities

(9) Projected Start Date: January 2009

(10) Projected End Date: June 2010

(11) Specific Activity Requirements: All properties acquired for rehabilitation will have a minimum discount of 5%, and we will negotiate for greater discounts on buildings that will require greater rehabilitation to ensure that we meet the requirement that our total portfolio of acquisitions has an average discount 15%. We will obtain current appraisals prior to entering into negotiations to purchase properties to ensure that we are meeting the discount requirements. We will track and monitor all appraised values and actual acquisition prices to ensure that we are meeting the specific requirement that the overall portfolio of NSP acquisitions has an average discount of 15% from the current appraised value.

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

(1) Activity Name: Rehabilitation for Rental

(2) Activity Type: NSP eligible uses: (B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties. CDBG eligible activity: 24 CFR 570.202 Eligible rehabilitation and preservation activities.

(3) National Objective: LMMH (Low/Moderate/Middle Income Housing benefit): provides or improves permanent residential structures that will be occupied by a household whose income is at or below 120 percent of area median income.

(4) Activity Description: After acquiring properties that it has determined will be rehabilitated and used as affordable rental properties, the City of Chicago or the Subgrantee will assign the properties to Participating Entities (qualified pre-approved developers, both for-profit and non-profit) who will be responsible for rehabilitating them. The Subgrantee will provide NSP funds to developers to assist in the rehabilitation of the properties, which will be used as affordable rental properties. This activity will be used to meet the requirement that 25% of our NSP grant be used to assist households making no more than 50% AMI.

Rehabilitation will bring the properties up to local building code standards and HUD Housing Quality Standards (HQS).

Most of the properties assisted through this activity will be 2-6 unit buildings. In 2007, 35% of the foreclosure filings in the City of Chicago were in 2-6 unit buildings, and in some of our areas of greatest need, 2-6 unit buildings represent up to 80% of the foreclosure filings in 2007.

This activity will address all of the areas of greatest need, though activity will be concentrated in the West and South regions because these regions have more 2-6 unit buildings than the Southwest and Far South regions.

(5) Location Description: Specific addresses of properties to be rehabilitated for use as rental properties will be provided as they are identified. All properties will be located in the areas of greatest need, as described in Part A.

(6) Performance Measures: 150 dwelling units, all of which will serve households making no more than 50% of area median income.

(7) Total Budget:

NSP Funds: \$4,500,000

Private Financing: \$13,500,000

(8) Responsible Organization: The City of Chicago, the Subgrantee, or Participating Entities

(9) Projected Start Date: January 2009

(10) Projected End Date: December June 2010

(11) Specific Activity Requirements: The financial model for providing assistance to these rental buildings is in development, but we anticipate the rehabilitation funds will be loaned or granted to the developer, and the minimum affordability period will be consistent with the HOME program, where the affordability period ranges from 5 to 20 years, based on the amount of investment per unit.

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

(1) Activity Name: Rehabilitation for Homeownership

(2) Activity Type: NSP eligible use: (B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties. CDBG eligible activity: 24 CFR 570.202 Eligible rehabilitation and preservation activities.

(3) National Objective: LMMH (Low/Moderate/Middle Income Housing benefit): provides or improves permanent residential structures that will be occupied by a household whose income is at or below 120 percent of area median income.

(4) Activity Description: After acquiring properties that it was determined will be rehabilitated for sale to owner-occupants, the City of Chicago or the Subgrantee will assign the properties to Participating Entities (qualified pre-approved developers, both for-profit and non-profit) who will be responsible for rehabilitating them. The Subgrantee will provide NSP funds to developers to assist in the rehabilitation of the properties, which after rehabilitation will be sold to households making no more than 120% of the area median income (AMI).

Since the NSP funds will be utilized primarily to pay for the acquisition of property for both rental and for-sale purchase-rehab, the NSP funds will, in most cases, be passed on to the Participating Entities through a reduction in the purchase price of the property.

We do not anticipate that this activity will be used to meet the requirement that 25% of our NSP grant be used to assist households making no more than 50% AMI, though in some cases, the eligible homebuyers may be at this income level. This activity will address all of the areas of greatest need.

Rehabilitation will be to the extent necessary to bring the properties up to local building code standards and HUD Housing Quality Standards (HQS).

(5) Location Description: Specific addresses of properties to be rehabilitated for use as owner-occupied properties will be provided as they are identified. All properties will be located in the areas of greatest need, as described in Part A.

(6) Performance Measures: 275 units, all of which will assist households making no more than 120% AMI

(7) Total Budget:

NSP Funds: \$4,125,000

Private Financing: \$33,000,000

(8) Responsible Organization: The City of Chicago, the Subgrantee, or Participating Entities

(9) Projected Start Date: January 2009

(10) Projected End Date: June 2010

(11) Specific Activity Requirements: The period of affordability for each assisted homeownership unit will be modeled after the HOME homeownership affordability requirements and will be based on the amount of permanent subsidy going to the homebuyer, with a minimum affordability period of 5 years. In some cases, the amount of permanent subsidy that the homebuyer receives may be zero, and in this case the minimum affordability period would be five years. If a homeowner does receive a permanent subsidy, we expect to impose a lien to ensure compliance with the applicable affordability requirements. In addition, we will impose resale/recapture provisions if the home is sold during the period of affordability. In some areas, we may also opt to place the unit in the Chicago Community Land Trust, which places deed restrictions on the units placed in it in order to main long-term affordability.

The City of Chicago or the Subgrantee will also ensure that all homebuyers receiving assistance through this activity receive the NSP-required eight hours of homebuyer counseling.

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

(1) Activity Name: Acquisition of Blighted Structures for Land Bank

(2) Activity Type: NSP eligible uses: (C) Establish land banks for homes that have been foreclosed upon;. CDBG eligible activities: 24 CFR 570.201 (a) Acquisition and (b) Disposition.

(3) National Objective: LMMA (Low/Moderate/Middle Income Area benefit): serves an area in which at least 51 percent of the residents have incomes at or below 120 percent of area median income.

(4) Activity Description: The City of Chicago or the Subgrantee will acquire real estate owned (REO) properties that may require demolition. These properties would be demolished because they are so blighted that the required investment to bring them up to code and habitable is much greater than the expected sales price of the property.

All properties acquired for demolition will be placed in a land bank after the structure is demolished. The land bank will hold these cleared parcels of land for future redevelopment, whether residential, commercial, or retail.

This activity will address all the areas of greatest need, as our research indicates there are vacant blighted structures in all four of these areas. The expected benefit of this activity to low-, moderate- and middle-income households is an area benefit. All properties that are acquired for demolition will be located in low-, moderate-, and middle-income (LMMI) census tracts, and the residents of those census tracts will benefit by from the elimination of these vacant, blighted structures, which pose health and safety hazards and are often associated with criminal activity.

This activity will not be used to meet the requirement that 25% of the NSP funds be used to assist households making no more than 50% of the area median income.

(5) Location Description: Specific addresses of properties to be acquired for demolition and placed in the land bank will be provided as they are identified. All properties will be located in the areas of greatest need, as described in Part A.

(6) Performance Measures: 100 units, all of which will be located in areas where at least 51 percent of the residents have incomes at or below 120 percent of area median income

(7) Total Budget:

NSP Funds: \$4,500,000

(8) Responsible Organization: The City of Chicago or the Subgrantee

9) Projected Start Date: January 2009

(10) Projected End Date: June 2010

(11) Specific Activity Requirements: Per the NSP regulations, the minimum discount rate for properties purchased for demolition will be 5%. We will negotiate strongly for discounts greater than 5% for these properties because they will be in severe disrepair. Greater discounts on these properties will help ensure that our total portfolio has an average discount of 15%, as required by the NSP regulations. We will obtain current appraisals prior to entering into negotiations to purchase properties to ensure that we are meeting the discount requirements. We will track and monitor all appraised values and actual acquisition prices to ensure that we are meeting the specific requirement that the overall portfolio of NSP acquisitions has an average discount of 15% from the current appraised value.



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

(1) Activity Name: Demolition

(2) Activity Type: NSP eligible use: (D) Demolish blighted structures. CDBG eligible activity: 24 CFR 570.201 (d) Clearance and remediation activities.

(3) National Objective: LMMA (Low/Moderate/Middle Income Area benefit): serves an area in which at least 51 percent of the residents have incomes at or below 120 percent of area median income.

(4) Activity Description: The City of Chicago or the Subgrantee will demolish vacant, foreclosed blighted properties that it has acquired from lending institutions. These properties will be demolished because they are so blighted that the required investment to bring them up to code and habitable is much greater than the expected sales price of the property.

This activity will address all the areas of greatest need, as our research indicates there are vacant blighted structures in all four of these areas. The expected benefit of this activity to low-, moderate- and middle-income households is an area benefit. All properties that are demolished will be located in census tracts in which at least 51 percent of the residents have incomes at or below 120 percent of area median income, and the residents of those census tracts will benefit by from the elimination of these vacant, blighted structures, which pose health and safety hazards and are often associated with criminal activity.

This activity will not be used to meet the requirement that 25% of the NSP funds be used to assist households making no more than 50% of the area median income.

(5) Location Description: Specific addresses of properties to be demolished will be provided as they are identified. All properties will be located in the areas of greatest need, as described in Part A.

(6) Performance Measures: 100 units, all of which will be located in areas where at least 51 percent of the residents have incomes at or below 120 percent of area median income

(7) Total Budget:

NSP Funds: \$2,000,000

(8) Responsible Organization: The City of Chicago or the Subgrantee

(9) Projected Start Date: January 2009

(10) Projected End Date: June 2010

(11) Specific Activity Requirements: Not applicable

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

(1) Activity Name: New Construction

(2) Activity Type: NSP eligible use: (E) Redevelop demolished or vacant properties.  
CDBG eligible activity: 24 CFR 570.201 (m) Construction of housing.

(3) National Objective: LMMH (Low/Moderate/Middle Income Housing benefit): provides or improves permanent residential structures that will be occupied by a household whose income is at or below 120 percent of area median income.

(4) Activity Description: We plan to use NSP funds to construct new ownership or rental housing on some parcels of land where a vacant, blighted, foreclosed property was demolished. After demolishing a blighted structure and clearing the property, the City or the Subgrantee will assign the property to a Participating Entity to construct a new home on the site.

The benefit to low-, moderate- and middle-income households will be a housing benefit, and all of the homes built will be sold to households making no more than 120% of the area median income (AMI).

This activity will address all the areas of greatest need.

Some rental units may be constructed under this activity. Any rental units that are constructed will likely serve households making no more than 50% AMI and will be used to meet the 25% requirement. We do not expect that homebuyers assisted through this activity will have incomes at the 50% AMI level.

(5) Location Description: Specific addresses of properties to be cleared of blighted structures and then subsequently redeveloped with owner-occupied housing will be provided as they are identified. All properties will be located in the areas of greatest need, as described in Part A.

(6) Performance Measures: 60 units, all of which will serve households making no more than 120% AMI. The units will likely be a mix of rental and homeownership units, and we will provide greater detail on the unit mix as the units are planned and built.

(7) Total Budget:

NSP Funds: \$2,400,000

Private Financing: \$12,000,000

(8) Responsible Organization: The City of Chicago, the Subgrantee, or Participating Entities

(9) Projected Start Date: January 2009

(10) Projected End Date: June 2010

(11) Specific Activity Requirements: The period of affordability for each assisted homeownership unit will be modeled after the HOME homeownership affordability requirements and will be based on the amount of permanent subsidy going to the homebuyer, with a minimum affordability period of 5 years. In some cases, the amount of permanent subsidy that the homebuyer receives may be zero, and in this case the minimum affordability period would be five years. If a homeowner does receive a permanent subsidy, we expect to impose a lien to ensure compliance with the applicable affordability requirements. In addition, we will impose resale/recapture provisions if the home is sold during the period of affordability. In some areas, we may also opt to place the unit in the Chicago Community Land Trust, which places deed restrictions on the units placed in it in order to main long-term affordability.

The City of Chicago or the Subgrantee will also ensure that all homebuyers receiving assistance through this activity receive the NSP-required eight hours of homebuyer counseling.

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

(1) Activity Name: Homebuyer Financing/Loan Pool

(2) Activity Type: NSP eligible use: (A) Establish financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-seconds, loan loss reserves, and shared-equity loans for low- and moderate-income homebuyers. CDBG eligible activity: 24 CFR 570.201 (n) Homeownership Assistance.

(3) National Objective: LMMH (Low/Moderate/Middle Income Housing benefit): provides or improves permanent residential structures that will be occupied by a household whose income is at or below 120 percent of area median income.

(4) Activity Description: Due to the tightening credit market, the City of Chicago is concerned that many eligible homebuyers may not qualify for a mortgage that would allow them to purchase a home that has been rehabilitated through the Neighborhood Stabilization Program initiative. Because one of our goals is to get these homes occupied as quickly as possible, we will develop a financing tool that will make it easier to eligible, credit-worthy homebuyers to obtain mortgages. This tool is still in development and may take the form of a loan loss reserve or other credit enhancement that would provide assurances to lending institutions providing mortgages to households purchasing a home rehabilitated with NSP funds. The City of Chicago currently contributes CDBG funds up to \$4 million a year to Neighborhood Housing Services of Chicago (NHS Chicago) to operate a similar program, the Neighborhood Lending Program (NLP), a \$30-million a year loan pool funded by investments of local lending institutions. NLP could serve as a model for how this activity would be structured.

This activity will address all the areas of greatest need.

We do not expect that this activity will be used to meet the requirement that 25% of the NSP funds be used to assist households making no more than 50% of the area median income (AMI), though some of the homebuyers assisted through this activity may have incomes at this level.

(5) Location Description: Specific addresses of properties to be assisted with homebuyer financing will be provided as they are identified. All properties will be located in the areas of greatest need, as described in Part A.

(6) Performance Measures: 275 units, all of which will assist households making no more than 120% AMI

(7) Total Budget:

NSP Funds: \$5,626,715

(8) Responsible Organization: The City of Chicago, the Subgrantee, or Participating Entities

(9) Projected Start Date: January 2009

(10) Projected End Date: June 2010

(11) Specific Activity Requirements: The period of affordability for each assisted homeownership unit will be modeled after the HOME homeownership affordability requirements and will be based on the amount of permanent subsidy going to the homebuyer, with a minimum affordability period of 5 years. In some cases, the amount of permanent subsidy that the homebuyer receives may be zero, and in this case the minimum affordability period would be five years. If a homeowner does receive a permanent subsidy, we expect to impose a lien to ensure compliance with the applicable affordability requirements. In addition, we will impose resale/recapture provisions if the home is sold during the period of affordability. In some areas, we may also opt to place the unit in the Chicago Community Land Trust, which places deed restrictions on the units placed in it in order to main long-term affordability.

The City of Chicago or the Subgrantee will also ensure that all homebuyers receiving assistance through this activity receive the NSP-required eight hours of homebuyer counseling.

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

(1) Activity Name: Planning and Administration

(2) Activity Type: NSP eligible use: 10 percent cap on planning and administrative costs. CDBG eligible activity: 24 CFR 570.206 (a) General management, oversight, and coordination and (e) Indirect costs.

(3) National Objective: Not applicable

(4) Activity Description: Program planning and administration costs associated with implementation of the City of Chicago's Neighborhood Stabilization Program grant.

(5) Location Description: Not applicable

(6) Performance Measures: Not applicable

(7) Total Budget:

NSP Funds: \$5,523,802

(8) Responsible Organization: The City of Chicago, the Subgrantee, or Participating Entities

(9) Projected Start Date: January 2009

(10) Projected End Date: June 2010

(11) Specific Activity Requirements: Not applicable

City of Chicago  
Neighborhood Stabilization Program  
Substantial Amendment

Budget Summary

<b>Activity</b>	<b>Proposed NSP Budget</b>
Acquisition for Rehab	\$26,562,500
Rehab for Rental	\$4,500,000
Rehab for Homeownership	\$4,125,000
Acquisition for Land Bank	\$4,500,000
Demolition	\$2,000,000
New Construction	\$2,400,000
Homebuyer Financing/Loan Pool	\$5,626,715
Administration	\$5,523,802
<b>Total</b>	<b>\$55,238,017</b>

## Top Quartile of Chicago Community Areas by Need Criteria

Foreclosures Completed	
South Region	Washington Park
South Region	Grand Boulevard
South Region	Englewood
South Region	Woodlawn
South Region	West Englewood
West Region	West Garfield Park
South Region	Fuller Park
Far South Region	West Pullman
South Region	Burnside
South Region	Greater Grand Crossing
South Region	South Chicago
West Region	North Lawndale
West Region	East Garfield Park
South Region	New City
South Region	South Shore
Far South Region	Roseland
Southwest Region	Chicago Lawn
West Region	Humboldt Park
South Region	Auburn Gresham

Subprime Loans	
South Region	Fuller Park
South Region	Englewood
South Region	West Englewood
Far South Region	Riverdale
Far South Region	West Pullman
West Region	West Garfield Park
South Region	Burnside
South Region	South Chicago
Far South Region	Roseland
South Region	Greater Grand Crossing
South Region	Auburn Gresham
Far South Region	South Deering
South Region	Chatham
Southwest Region	Chicago Lawn
West Region	Austin
South Region	Washington Park
West Region	North Lawndale
South Region	New City
Far South Region	Pullman

Home Value Decrease (Single Family)	
South Region	Fuller Park
West Region	West Garfield Park
West Region	East Garfield Park
South Region	New City
South Region	West Englewood
South Region	Englewood
West Region	North Lawndale
South Region	Burnside
Far South Region	Riverdale
South Region	South Chicago
South Region	Woodlawn
South Region	Oakland
Far South Region	West Pullman
West Region	Humboldt Park
South Region	Greater Grand Crossing
Central Region	Bridgeport
Far South Region	Pullman
Southwest Region	Chicago Lawn
Far South Region	Roseland

Unemployment Rate	
Far South Region	Riverdale
South Region	Oakland
South Region	Englewood
West Region	North Lawndale
South Region	West Englewood
South Region	Grand Boulevard
South Region	Washington Park
West Region	East Garfield Park
West Region	West Garfield Park
Central Region	Douglas
South Region	Burnside
South Region	Woodlawn
South Region	Greater Grand Crossing
South Region	South Chicago
South Region	Fuller Park
West Region	Humboldt Park
West Region	Austin
Far South Region	Pullman
Far South Region	Roseland

### Color Key:

North Region
Central Region
South Region
Far South Region
Southwest Region
West Region
Northwest Region

### NSP Areas of Greatest Need, as identified pursuant to the Section 2301(c)(2) of the Housing and Economic Recovery Act of 2008:

- |                           |                       |
|---------------------------|-----------------------|
| 1 Auburn Gresham          | 14 Oakland            |
| 2 Austin                  | 15 Pullman            |
| 3 Burnside                | 16 Riverdale          |
| 4 Chatham                 | 17 Roseland           |
| 5 Chicago Lawn            | 18 South Chicago      |
| 6 East Garfield Park      | 19 South Deering      |
| 7 Englewood               | 20 South Shore        |
| 8 Fuller Park             | 21 Washington Park    |
| 9 Grand Boulevard         | 22 West Englewood     |
| 10 Greater Grand Crossing | 23 West Garfield Park |
| 11 Humboldt Park          | 24 West Pullman       |
| 12 New City               | 25 Woodlawn           |
| 13 North Lawndale         |                       |

The 25 community areas identified as areas of greatest need are those which fall into the top quartile of either foreclosures completed or percent of subprime loans or those which fall into the top quartile of both the home value decrease and unemployment rate.