Name: Narrative Attachment 01: Implementation Grants Key

Name of Lead Applicant: City of Milwaukee

Eligibility Threshold Data Form

Name of File: Att01KeyEligThreshDataForm

U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB Approval No. 2577-0269 (exp. 1/31/2015)

CHOICE NEIGHBORHOODS IMPLEMENTATION GRANTS APPLICATION INFORMATION

ELIGIBLE NEIGHBORHOOD	
Name of Neighborhood	Westlawn
ELIGIBLE APPLICANT You must provide the following inform	nation for the Lead Applicant and, if applicable, the Co-Applicant
Lead Applicant:	City of Milwaukee
Type of Eligible Applicant (check one)	Public Housing Agency X Local Government Tribal Entity PHA Code:
Mailing Address:	Nonprofit For profit developer applying jointly with a public entity City Hall, 200 East Wells Street, Room 201, Milwaukee WI 53202
Executive Officer Name & Title:	Tom Barrett, Mayor of Milwaukee
,,	414-286-2200 Fax: 411-286-3131 Email: Mayor@milwaukee.gov
Primary Contact Name & Title:	Sharon Robinson, Director - City of Milwaukee - Department of Administration
Telephone:	414-286-3828 Fax: 414-286-5003 Email: <u>srobin@milwaukee.gov</u>
Co-Applicant (if any):	Housing Authority of the City of Milwaukee
Type of Eligible Applicant (check one)	X Public Housing Agency Local Government Tribal Entity PHA Code: WI002
	Nonprofit For profit developer applying jointly with a public entity
Mailing Address:	809 North Broadway Street, Milwaukee WI 53202
Executive Officer Name & Title:	Antonio Perez, Secretary/Executive Director
Telephone:	414-286-5670 Fax: 414-286-0833 Email: <u>tperez@hacm.org</u>
Primary Contact Name & Title:	Bobbi Marsells, Assistant Secretary
Telephone:	414-2862920 Fax: 414-286-0833 Email: <u>bmarse@hacm.org</u>

PRINCIPAL TEAM MEMBERS

Housing Implementation Entity: Housing Authority of the City of Milwaukee Mailing Address: 809 North Broadway Street, Milwaukee WI 53202 Executive Officer Name & Title: Antonio Perez, Secretary/Executive Director Telephone: 414-286-5670 Fax: 414-286-0833 Email: tperez@hacm.org Primary Contact Name & Title: Bobbi Marsells, Assistant Secretary Telephone: 414-286-2920 Fax: 414-286-0833 Email: bmarse@hacm.org People Implementation Entity: Housing Authority of the City of Milwaukee Mailing Address: 809 North Broadway Street, Milwaukee WI 53202 Executive Officer Name & Title: Antonio Perez, Secretary/Executive Director Telephone: 414-286-5670 Fax: 414-286-0833 Email: tperez@hacm.org Primary Contact Name & Title: Kenneth Barbeau, Director, HACM Community Programs and Services Telephone: 414-286-2905 Fax: 414-286-3169 Email: kbarbe@hacm.org **Neighborhood Implementation** Entity: Redevelopment Authority of the City of Milwaukee Mailing Address: 809 North Broadway Street, Milwaukee WI 53202 Executive Officer Name & Title: Rocky Marcoux, Commissioner *Telephone:* 414-286-5800 Fax: 414-286-0395 rocky.marcoux@milwaukee.gov Email: Primary Contact Name & Title: Vanessa Koster, City Planning Manager Telephone: 414-286-5671 414-286-5716 Email: vkoste@milwaukee.gov Education Implementation Entity: Milwaukee Public Schools Mailing Address: 5225 West Vlet Street, Milwaukee, WI 53208 Executive Officer Name & Title: Darienne B. Driver, Superintendent, Milwaukee Public Schools

414-475-8585

414-475-8422

Fax:

Fax:

Email:

Email:

driverdb@milwaukee.k12.wi.us

thompsmx@milwaukee.k12.wi.us

Telephone: 414-475-8001

Telephone: 414-475-8203

Primary Contact Name & Title: Marie Thompson, Director, MPS Grants Development

ELIGIBLE TARGET HOUSING

Your application must focus on severely distressed public and/or HUD-assisted housing. See section I.C for defintions of "public housing," "assisted housing," and "severely distressed housing."

Provide the following information for each target housing project. List each site separately.

Project #1 Project Nam					
Type of Eligi					
(check one)		(section 9)	section	202	section 236
(criccit oric)	Project-based	•	section		Indian Housing
	Project-based				Indian Housing
	Project-based	vouchers	section	221(d)(3)	
	If Public Housing	PIC AMP Number:	WI00200007	70	
		"old" Project Number:	: WI00200000)2	
	If Assisted Housing	Contract Number:			=
		REMS Number:			
		If FHA Insured, FHA #:			
Physical Stre	eet Address	6301 W. Sheridan Ave.	/ 5411-5557 N	N. 64th St.	
(include city,	state and ZIP)	Milwaukee, WI 53218			
Unit Informa	ation as of Application	on Date			
	Total Nu	ımber of Units in Project	394	Number Occupied	d <u>382</u>
Num	nber of Public and/or	Assisted Units in Project	t 394	Number Vacant	12
	if applicable)				
Project Nam	ne:				
Project Nam Type of Eligi	ne: ble Housing	(section 9)	Section	202	Section 236
Project Nam	ne: ible Housing Public Housing	•	section	_	section 236
Project Nam Type of Eligi	ne: ible Housing Public Housing Project-based	section 8	section	811	section 236
Project Nam Type of Eligi	ne: ible Housing Public Housing	section 8	section	_	
Project Nam Type of Eligi	ne: ible Housing Public Housing Project-based	section 8	section section	811	
Project Nam Type of Eligi	he:	section 8 vouchers	section section	811	
Project Nam Type of Eligi	he:	section 8 vouchers PIC AMP Number: "old" Project Number:	section section	811	
Project Nam Type of Eligi	he:	section 8 vouchers PIC AMP Number: "old" Project Number: Contract Number:	section section	811	
Project Nam Type of Eligi	he:	section 8 vouchers PIC AMP Number: "old" Project Number: Contract Number: REMS Number:	section	811	
Project Nam Type of Eligi	he:	section 8 vouchers PIC AMP Number: "old" Project Number: Contract Number:	section	811	
Project Nam Type of Eligi	Public Housing Project-based Project-based If Public Housing	section 8 vouchers PIC AMP Number: "old" Project Number: Contract Number: REMS Number:	section	811	
Project Nam Type of Eligi (check one) Physical Street	Public Housing Project-based Project-based If Public Housing	section 8 vouchers PIC AMP Number: "old" Project Number: Contract Number: REMS Number:	section	811	
Project Nam Type of Eligi (check one) Physical Stre (include city,	Public Housing Project-based Project-based If Public Housing If Assisted Housing Project-based	rection 8 vouchers PIC AMP Number: "old" Project Number: Contract Number: REMS Number: If FHA Insured, FHA #:	section	811	
Project Nam Type of Eligi (check one) Physical Stre (include city,	Public Housing Public Housing Project-based Project-based If Public Housing If Assisted Housing Peet Address State and ZIP) Ation as of Application	rection 8 vouchers PIC AMP Number: "old" Project Number: Contract Number: REMS Number: If FHA Insured, FHA #:	section	811	Indian Housing

Project #3 (if aplicable)				
Project Nam	ne:				
Type of Eligi	_				
Type of Eligi					
(check one)	Public Housing	(section 9)	section	202	section 236
	Project-based	section 8	section	811	Indian Housing
	Project-based	vouchers	section	221(d)(3)	
	If Public Housing	PIC AMP Number:			_
		"old" Project Number:			_
	If Assisted Housing	Contract Number:			
		REMS Number:			_
		If FHA Insured, FHA #:			_
Physical Stre	eet Address				
(include city,	state and ZIP)				
Unit Inform	ation as of Applicatio	un Data			
	ation as of Application	mber of Units in Project		Number Occu	niod
Num		Assisted Units in Project		Number Vaca	•
Null				Wallibel Vaca	
Project #4 (if applicable)				
Project Nam					
Type of Eligi	ble Housing				
Type of Eligi	ble Housing				
(check one)	Public Housing	(section 9)	section	202	section 236
	Project-based :	section 8	section	811	Indian Housing
	Project-based	vouchers	section	221(d)(3)	
	If Public Housing	PIC AMP Number:		, ,, ,	
		"old" Project Number:			_
	If Assistant Hausine	Control Number			<u>- </u>
	If Assisted Housing	Contract Number: REMS Number:			_
		If FHA Insured, FHA #:			_
		II THA IIIsureu, THA #.			
Physical Stre	eet Address				
-	state and ZIP)				
Hoit Information	ation as of Application	un Data			
Unit informa	ation as of Applicatio	mber of Units in Project		Number Occu	nied
1	iotaliyu	IIIDGI OI OIIILS III FIOLELL		Intuitibel Occu	picu
Num		Assisted Units in Project		Number Vaca	

Name: Narrative Attachment 02: Existing Units, Occupancy, Vacancy (HUD-53234)

Name of Lead Applicant: City of Milwaukee

Name of File:
Att02ExistingUnitsOccupVacancy

CHOICE NEIGHBORHOODS

Attachment 2

OMB Approval No. 2577-0269

(exp. 1/31/2015)

Existing Units, Occupancy, and Vacancy

Existing Housing Units at the Targeted Public and/or Assisted Site(s) at the Time of Grant Application

Puilding Time	Size	Number	Number Vacant	Total Units	Converted to Non-Dwelling	Demo Planned
Building Type		Occupied	Number vacant	Total Units	Non-Dweiling	Piannea
Row	0 BR	0.4				0.4
	1 BR	94	2	94	2	94
	2 BR	172	3	175	3	178
	3 BR 4 BR	89 27	5 1	94 28		94 28
	5 BR	21	1	28		20
	6 BR					
	Total	382	9	391	3	394
	Total	362	9	291	<u> </u>	394
Detached/	0 BR				1	
Semi-Detached	1 BR					
Jeim Detadilea	2 BR					
	3 BR					
	4 BR					
	5 BR					
	6 BR					
	Total					
Walkup	0 BR					
·	1 BR					
	2 BR					
	3 BR					
	4 BR					
	5 BR					
	6 BR					
	Total					
	•	•	•			
Elevator	0 BR					
	1 BR					
	2 BR					
	3 BR					
	4 BR					
	5 BR					
	6 BR					
	Total					
Grand Total		382	9	391	3	394

HUD-53234 (3/2011)

Narrative Attachment 03: Planned Units

Name of Lead Applicant: City of Milwaukee

Name of File: Att03PlannedUnits

CHOICE NEIGHBORHOODS - IMPLEMENTATION GRANTS Attachment 3: Planned Units

Replacement Housing

						Rental Units:	Replacement Ho	using - Public Ho	using-Related					
PH Only			PH/LIHTC			PH/Other			Other: [enter ty	pe name]		Total		
	Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside
On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)
22	18		354									376	18	

					Ren	tal Units: Replac	ement Housing -	Multifamily Assi	sted Housing-Rel	ated				
Section 202			Section 811			Project-based Si	ection 8		Other: [enter ty	pe name]		Total		
	Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside
On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)

Tenant-based Vouchers: Replacement Housing (subject to HUD approval)

Non-Replacement Housing

		Rental Units: N	Ion-Replacemen	t Housing - With	Choice Neighbor	hoods Grant Fund	ding Assistance				
Type: Market Ro	ate		Type: LIHTC			Type: [enter typ	e name]		Total		
	Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside
On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)
6			20						26		

					Rental Units: No	n-Replacement I	Replacement Housing - Without Choice Neighborhoods Grant Funding Assistance							
LIHTC			CDBG, HOME, or	r other subsidy		No Income Resti	rictions		Other: [enter ty	pe name]		Total		
	Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside
On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)
73	30					75	60					148	90	

						Homeowner	ship Units (also I	Non-Replacement	: Housing)								
Affordable Fee Simple Affordable Lease/Purchase Choice Neighborhoods and/or with Choice Neighborhoods and/or		r	with Choice Neig	ortgage Only hborhoods and/o funds	r	Homeownership with other subsidies (No Choice Neighborhoods or PH funds)			Market Rate Homeownership (No subsidies)			Total					
	Off-Site (inside neighborhood)	Off-Site (outside neighborhood)	On-Site	Off-Site (inside neighborhood)	Off-Site (outside neighborhood)	On-Site		Off-Site (outside neighborhood)			Off-Site (outside neighborhood)			Off-Site (outside neighborhood)		Off-Site (inside neighborhood)	Off-Site (outside neighborhood)
												25	25		25	25	

			Othe	r Units (operatin	g subsidy only, et	rc)								
Type: [enter type	pe name]		Type: [enter typ	e name]		Type: [enter typ	e name]		Type: [enter typ	e name]		Total		
	Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside		Off-Site (inside	Off-Site (outside
On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)	On-Site	neighborhood)	neighborhood)

Grand Total (Replacement vs. Non-replacement)

On-Site		neighborhood)
	[18] vs. [115]	[]vs.[]

Grand Total (Rental vs. Homeownership)

	Off City (in side	Off 614- /4-14-
On-Site	neiahborhood	Off-Site (outside
	[108] vs. [25]	
		[658] vs. [50]

Grand Total (Affordable vs. Market Rate)

Grana rotar A	JJOI GUDIC VS. IVI	urket nute,
	Off-Site (inside	Off-Site (outside
On-Site	neighborhood	neighborhood)
[469] vs. [106]	[48] vs. [85]	[] vs. []
Grand Total - All Units		[517] vs. [191]

Grand Total (On-Site, Off-Site)

575 Grand	133 Total - All Units	708
On-Site	Off-Site (inside neighborhood	Off-Site (outside neighborhood)

HUD-53234 (3/2011)

Narrative Attachment 04: RAD Certification

Name of Lead Applicant: City of Milwaukee

Name of File: Att04RADCertification



Tom Barrett Mayor

Antonio M. Perez Secretary-Executive Director

Board of Commissioners

February 9, 2015

Secretary Julián Castro
U.S. Department of Housing and Urban Development
451 Seventh Street, NW
Washington, DC 20410

Dear Secretary Castro:

As stated in the Housing Strategy section, our FY 2014/2015 Choice Neighborhoods Implementation Grant application is a joint RAD application. Per the NOFA, we hereby affirmatively request that the Westlawn Housing Development be placed on the RAD waiting list for 394 units until HUD has statutory authority to convert additional units under RAD.

Sincerely,

Mark A, Wagner

Chair, HACM Board of Commissioners

Antonio M. Pérez

Secretary-Executive Director



Narrative Attachment 05: Eligible Applicants Documentation

Name of Lead Applicant: City of Milwaukee

Name of File:
Att05EligibleApplicantsDoc



Name: Narrative Attachment 06: Partnership Certifications

Name of Lead Applicant: City of Milwaukee

Name of File: Att06PartnershipCertifications

WESTLAWN CHOICE NEIGHBORHOODS PARTNERSHIP CERTIFICATION

BY AND BETWEEN THE CITY OF MILWAUKEE, THE HOUSING AUTHORITY OF THE CITY OF MILWAUKEE, THE REDEVELOPMENT AUTHORITY OF THE CITY OF MILWAUKEE, AND THE MILWAUKEE PUBLIC SCHOOLS

This Westlawn Choice Neighborhoods Partnership Certification ("Certification") is entered into, by and between the City of Milwaukee, the local governmental unit; the Housing Authority of the City of Milwaukee ("Housing Authority"), a public body corporate and politic, created and existing under the laws of the State of Wisconsin; the Redevelopment Authority of the City of Milwaukee ("Redevelopment Authority"), a public body corporate and politic, created and existing under the laws of the State of Wisconsin; and Milwaukee Public Schools, a public body under the laws of the State of Wisconsin.

WHEREAS, the Westlawn Housing Development is a large, distressed public housing development located along Silver Spring Drive between 64th and 68th Streets; and

WHEREAS, the "Westlawn Neighborhood" is bounded approximately by Sherman Boulevard to the east, 76th Street to the west, Villard Ave. to the south, and Mill Road to the north; and

WHEREAS, the Westlawn Transformation Plan is an initiative to transform Milwaukee's Westlawn community from a neighborhood of concentrated poverty into a "community of choice" by providing positive strategies and outcomes for neighborhood residents in three broad areas: Housing, People and Neighborhood; and

WHEREAS, the City of Milwaukee in collaboration with implementing organizations and other partners, seek to transform the Westlawn Neighborhood by revitalizing the Westlawn housing site, improving access to economic opportunities, and investing in and leveraging investments in well-functioning services, effective high quality schools and education programs, high quality early education programs, crime prevention strategies, public assets, public transportation, and improved access to jobs, all to support positive educational, social and economic outcomes for current residents of Westlawn, residents of the replacement housing and residents of the Westlawn Neighborhood; and

WHEREAS, The United States Department of Housing and Urban Development ("HUD") has issued a Notice of Funding Availability for the Choice Neighborhoods Implementation ("CNI") grant program on November 6, 2014;

WHEREAS, the City of Milwaukee as the Lead Applicant and the Housing Authority of the City of Milwaukee as the Co-Applicant, in collaboration with implementing organizations and other partners, are preparing a Choice Neighborhoods Implementation grant proposal for the Westlawn Neighborhood, and will submit the final proposal to HUD on or before February 9, 2015; and

WHEREAS, the Choice Neighborhoods application to be submitted to HUD outlines the Westlawn Transformation Plan which includes components to transform housing, the neighborhood, educational opportunities and the people living in the Westlawn Neighborhood; and

WHEREAS, in order to provide a clear assignment of specific roles and responsibilities in the event the Housing Authority and the City of Milwaukee are awarded Choice Neighborhoods Program funds pursuant to the NOFA, the parties wish to articulate the agreements between them with respect to the transformation of the Westlawn Neighborhood.

NOW, THEREFORE, in consideration of the foregoing recitals and underlying promises, which both parties agree to be good and valuable consideration, the parties agree as follows:

Article 1: Nature of the Relationship

The parties will undertake all the activities outlined herein as independent entities, pursuant to the terms and conditions set forth herein. All parties acknowledge that nothing which may be contained in the Choice Neighborhoods Implementation Grant Application to HUD or this Certification will be deemed or construed to create any relationship of third party beneficiary, principal and agent, limited or general partnership, general or co-venturer, or any association or relationship in any way involving HUD, the City of Milwaukee, the Housing Authority, or otherwise affecting the parties, other than as expressly set forth in this Certification.

Article 2: Collaboration

The parties acknowledge that the success of a comprehensive effort to transform the Westlawn Neighborhood into a "community of choice," as anticipated in the Transformation Plan, relies on the close collaboration among the Principal Team Members, under the leadership of the City of Milwaukee, the Housing Authority of the City of Milwaukee (Housing Authority), the Redevelopment Authority of the City of Milwaukee (Redevelopment Authority) and Milwaukee Public Schools (MPS). The parties agree to work collaboratively during the entirety of the Choice Neighborhoods Implementation grant, if funded.

Article 3. Duties and Responsibilities of the Lead Applicant and Co-Applicant

- 3.1 The City of Milwaukee agrees to act as the Lead Applicant for the Westlawn Choice Neighborhoods Implementation and the Housing Authority of the City of Milwaukee agrees to act as the Co-Applicant.
- 3.2 In all matters related to the application to the Choice Neighborhoods Program under the NOFA, the City of Milwaukee shall be identified as the "Lead Applicant". The City of Milwaukee, as the Lead Applicant, shall be the primary entity responsible for overseeing and coordinating all elements of the Choice Neighborhoods Transformation Plan and is accountable

to HUD to complete the work that is proposed in the CNI grant application. Both the Applicant and Co-Applicant will sign the grant agreement. As Co-Applicant and grantee, the Housing Authority will have access to HUD's Line of Credit Control System (LOCCS) in order to draw down Choice Neighborhoods funding.

3.3. Both the City of Milwaukee as Lead Applicant and the Housing Authority as the Co-Applicant are jointly and severally liable for the performance of the CNI grant.

Article 4. Duties and Responsibilities of the Neighborhood Implementing Entity

- 4.1. The Redevelopment Authority of the City of Milwaukee agrees to act as the Neighborhood Implementing Entity for the Westlawn Choice Neighborhoods Implementation grant.
- 4.2. As the Neighborhood Implementation Entity, the Redevelopment Authority will be responsible for coordinating, overseeing, and implementing activities focused on economic development, neighborhood revitalization, and other critical community improvements as described in the Choice Neighborhoods application, in order to coordinate and improve access to opportunity and amenities for the residents of the Westlawn Neighborhood.
- 4.3 The Redevelopment Authority will coordinate activities with other public and community-based organizations and resources to improve measurable outcomes in the above areas for HUD-assisted residents and others in the Westlawn Neighborhood as described in the application.

Article 5. Duties and Responsibilities of the Housing Implementing Entity

- 5.1. The Housing Authority agrees to act as the Housing Implementing Entity for the Westlawn Choice Neighborhoods Implementation.
- 5.2. As the Housing Implementing Entity, the Housing Authority will act as its own developer and will be responsible for implementing day-to-day development and asset management activities associated with the Transformation Plan, including but not limited to the following: development of the site and units as described in the Choice Neighborhoods application; implementation of the overall master housing plan; selection and contracting with architects and engineers to develop plans and specifications required to implement the Westlawn Transformation Plan; procuring, selecting, executing construction contracts and monitoring general contractors' performance; preparing or cause to be prepared engineering survey, plans and specifications; and submitting/preparing financing/funding applications and negotiating/executing legal documents that facilitate the development of the Westlawn Transformation Plan. The Housing Authority is at-risk and financially responsible for developing the housing and the long-term asset management of the housing.

Article 6. Duties and Responsibilities of the People Implementation Entity

- 6.1. The Housing Authority agrees to act as the People Implementing Entity for the Westlawn Choice Neighborhoods Implementation.
- 6.2. As the People Implementation Entity, the Housing Authority will be responsible for facilitating the achievement of the supportive services strategy and for implementing ongoing case management and service coordination activities as described in the Choice Neighborhoods application, in order to coordinate and improve access to high-quality services in the area of health, economic development, education, and early childhood education. The overall goal will be to improve the quality of life of residents of all ages affected by the Transformation Plan.
- 6.3 The Housing Authority will coordinate activities with other public and community-based organizations and resources to improve measurable outcomes in the above areas for HUD-assisted residents and others in the Westlawn Neighborhood as described in the application.

Article 7. Duties and Responsibilities of the Principal Education Partner

- 7.1. Milwaukee Public Schools agrees to act as the Principal Education Partner for the Westlawn Choice Neighborhoods Implementation.
- 7.2. As the Principal Education Partner, Milwaukee Public Schools will be responsible for leading the Education component of the proposed Transformation Plan, and for implementing day-to-day program activities as described in the Choice Neighborhoods application in order to coordinate and improve access to high-quality early education programs and services and high quality K-12 education programs and school improvements that will improve measurable outcomes for HUD-assisted and other school-age children and youth in the Westlawn Neighborhood.
- 7.3 Milwaukee Public Schools will coordinate activities with other public and community-based organizations and resources to improve measurable outcomes in the area of education for HUD-assisted and other school-aged children and youth in the Westlawn Neighborhood as described in the application.

Article 8. Coordination

8.1. All parties to this Certification acknowledge and certify that efforts under this Certification are part of a program designed to enhance, in a comprehensive way, the quality of life for Westlawn residents and residents of the Westlawn Neighborhood. Consequently, the parties agree to cooperate, consult, and work collaboratively with each other to advance the Transformation Plan and to complete the activities contemplated by this Certification throughout the entirety of the grant.

- 8.2. All parties to this Certification shall participate in regular and periodic meetings of the Principal Team Members as such meetings may be called by the Lead Applicant.
- 8.3. The parties agree to work collaboratively to develop, coordinate and implement activities to transform the Westlawn Neighborhood during the entirety of the Choice Neighborhoods Implementation grant, and continue to work collaboratively after the end of the grant period to sustain neighborhood improvements.

Article 9. Reporting and Evaluation

- 9.1. As the Co-Applicant, the Housing Authority shall be primarily responsible for submission of all required reports to HUD or other governmental agencies, including, without limitation, monthly financial, management and project status activity reports. However, all other parties to this Certification shall cooperate with the Housing Authority by assisting in collection and compilation of data that is required or requested for reporting to HUD.
- 9.2. All parties to this Certification shall collect the data outlined in the Outcomes Metrics in the grant application and shall participate in efforts to evaluate and analyze such data and, if appropriate, amend the Transformation Plan and/or the implementing strategies adopted by the Principal Team Members in response to the evaluation and analysis of such data.

Article 10. Replacement of Team Member or Material Changes to Roles

10.1 The parties agree that, should the CNI grant be funded, it shall be necessary to secure HUD approval prior to replacing any Principal Team Member or effecting any material change to the roles and responsibilities to any Principal Team Member.

Article 11. Insurance and Liability

- 11.1 The parties warrant that each is covered by sufficient insurance coverage, or self-insured programs that may address any loss that may arise out of this Certification.
- 11.2 In accordance with applicable laws, the parties agree that each shall be responsible for defending and paying judgments on behalf of its officers, employees or agents while acting within the scope of their employment or agency for any claims that may arise out of negligent acts, failures to act, policies or directives of the respective party's officers, employees and agents relating to the activities covered by this Certification.

Article 12. Disputes

Disputes arising under this Certification shall first attempt to be resolved by discussion of the Principal Team Members (signatories to this Certification). If the parties still cannot resolve the dispute, it shall be decided by the Mayor of the City of Milwaukee or his designee. Pending settlement of any dispute, the party shall proceed diligently with the prosecution of this Certification.

Article 13. Confidentiality

All parties to this Certification agree and acknowledge that during the performance of services hereunder, the parties may receive and/or collect personal information about Choice Neighborhoods Program participants. Each party shall keep all Westlawn resident information confidential and shall not divulge this information to any third party other than the Principal Team Members without the explicit consent of the participant.

Article 14. Notices

Any and all notices regarding this Certification shall be in writing and deemed served upon depositing same with the United States Postal Services as "Certified Mail, Return Receipt Requested," addressed to the parties at:

City of Milwaukee, City Hall 200 E. Wells Street Milwaukee, WI 53202 Attention: Mayor Tom Barrett

Redevelopment Authority of the City of Milwaukee 809 North Broadway Milwaukee, WI 53202 Attention: Rocky Marcoux

Milwaukee Public Schools 5225 West Vliet Street Milwaukee, WI 53208

Attention: Dr. Darienne Driver, Superintendent

Housing Authority of the City of Milwaukee P.O. Box 324
Milwaukee, WI 53201-0324

Attention: Antonio M. Perez

Article 15. The Certification

- 15.1 Defining the Certification This Certification consists of the Documents enumerated in (1) through (3) below in order of priority. In the event of conflict between any of the documents enumerated below, the document of higher priority shall prevail.
 - (1) This Instrument;
 - (2) The Notice of Funding Availability for the Choice Neighborhoods Initiative Implementation Grant program;
 - (3) The Choice Neighborhoods Implementation grant application submitted by the Housing Authority to HUD.
- <u>15.2 Integration</u>. This Certification, as set forth in Article 13.1 constitutes the entire integrated agreement between the parties governing the subject services, and supersedes all prior negotiations, representations or agreements, either written or oral.
- <u>15.3 Governing Law.</u> Wisconsin state law shall govern the application, construction and enforcement of the Certification.
- <u>15.4 Final</u>. This Cerification may be amended, supplemented or changed with a written agreement signed by all parties. This Certification shall commence upon occurrence of the following: (a) execution hereof by all parties, and (b) the award of Choice Neighborhoods Program funds by HUD pursuant to the NOFA for the implementation of the Westlawn Transformation Plan resulting in a grant agreement.

IN WITNESS WHEREOF, the parties to this Certification have caused this Certification to be executed for and on their respective behalf and this Certification is effective as of January 2, 2015.

By:	Den Bant
	Mayor Tom Barrett City of Milwaukee
By:	Ruf Maring
	Rocky Marcoux Executive Director-Secretary Redevelopment Authority of the City of Milwaukee
By:	
G.	Dr. Darienne Driver Superintendent Milwaukee Public Schools
D.,,	At the second of
Ву:	Antonio M. Pérez

Secretary-Executive Director

Housing Authority of the City of Milwaukee

Narrative Attachment 07: Consistency with PHA/MTW Plan

Name of Lead Applicant: City of Milwaukee

Name of File: Att07ConsistencyWithPHAPlan



U.S. Department of Housing and Urban Development

Milwaukee Field Office Suite 950 310 West Wisconsin Avenue Milwaukee, WI 53203-2289 http://www.hud.gov/local/mil/

February 3, 2015

Antonio M. Perez, Secretary - Executive Director Housing Authority of the City of Milwaukee P.O. Box 324 Milwaukee, WI 53201

Dear Mr. Perez:

This letter is to inform you that the Housing Authority of the City of Milwaukee's Five Year /Annual Plan Amendment submission for the PHA Fiscal Year beginning January 1, 2015 is approved. This approval of the Annual Plan does not constitute an endorsement of the strategies and policies outlined in the Plan. In providing assistance to families under programs covered by this Plan, the HA will comply with the rules, standards, and policies established in its approved Plan, as provided in 24 CFR Part 903 and other applicable regulations. Your approved Plan and all required attachments and documents must be made available for review and inspection at the principal office of the HA during normal business hours.

Your Capital Funding Plan does not identify improvement items which are likely to trigger an Environmental Assessment (EA). If you should be intending any change to historic buildings, ground disturbance projects, sale of properties or acquisition of new real estate, just to name a few categories; it is your responsibility to ensure an Environmental Assessment (EA) is performed and your Responsible Entity (RE) is to perform a 24 CFR Part 58 EA for Capital Fund Program construction. These funds shall not be obligated until a Request for Release of Funds (Form HUD 7015.15) is approved. You should provide your RE with a copy of your CFP Annual Statement and Five-Year Action Plan immediately and remain in contact with them in case the need of an EA arises. Please contact Larry Wood at (414) 935-6739 if you have questions on this process.

If you have any questions regarding your PHA Plan or the information in this letter, please contact Beverly Carter, Revitalization Specialist at (414) 935-6726.

Sincerely,

John Finger, Program Center Coordinator

Wisconsin Public Housing

Program Center, 5IPH

www.hud.gov

español.hud.gov

Goal: Continue to implement asset based property management and attain fiscal sustainability of each AMP. 12/31/2015

Goal: Review/enforce/update Management Contract and Property Management Plan with Friends of Housing. 12/31/2015

Goal: Assess the feasibility of converting public housing units to project-based voucher units under the Rent Assistance Demonstration program and submit application if feasible. 12/31/2015

Goal: Implement cost effective energy improvements, including replacement of eligible vehicles, appliances, and toilets (in one of the high rises in partnership with MMSD) and/or recommendations in the energy audit. 12/31/2015

Goal: Implement a system for measuring the impact of energy and environmental improvements on utility consumption, cost and water quality. 12/31/2015

Goal: Develop a plan to reposition Scattered Sites AMPs that have negative cash flow. 12/31/2015

Goal: Secure capital through the Capital Fund Financing Program (CFFP) (12/31/2015)

Goal: Apply for Choice Neighborhood grant in partnership with the City of Milwaukee to target the Westlawn public housing development (AMP WI002000070) and revitalize the Westlawn neighborhood identified by the following boundaries: N. 76th Street, N. Sherman Blvd, W. Mill Road and W. Villard Ave. The Choice Neighborhoods Implementation grant application will be a joint RAD/Choice Neighborhoods Implementation grant application. (12/31/2015)

Goal: Obtain High Performer status on the Public Housing Assessment System (12/31/2015)

Goal: Maintain High Performer status on the Housing Choice Voucher Program (12/31/2015)

Goal: Continue to implement the Westlawn Transformation Plan, which includes the construction of one market-rate apartment building in 2015. (12/31/2015)

Goal: Submit mixed finance development applications to support the use of other financial resources, including low income housing tax credits (12/31/2015)

Goal: Achieve/maintain at least a 98% occupancy rate for all public housing developments (12/31/2015)

Goal: Open the wait list for the Housing Choice Voucher program (12/31/2015)

Goal: Continue Section 32 Homeownership Program and sell 12 homes to eligible families (12/31/2015)

Goal: Continue Section 8y Homeownership program and convert 12 households from rental to homeownership (12/31/2015)

In addition to the review and amendment of VAWA language in our policies, HACM also recently made modifications to the Notice of Rights and will continue to offer the Notice, along with form HUD-50066 and the "You Are Not Alone" pamphlet put out by the Milwaukee Commission on Domestic Violence and Sexual Assault, to all applicants at the time of eligibility and suitability review for housing, to those who are denied assistance, at the time an individual is admitted, and with any notification of eviction or notice of termination of assistance. Additionally, HACM sends a notice regarding VAWA rights to all property owners participating in the Housing Choice Voucher program.

HACM also has a Social Worker and Case Managers on staff and also works with a nonprofit service provider (SET Ministry) in a number of its developments for seniors or persons with disabilities. Each of these individuals offers case management services to those in need. HACM collaborates and makes referrals to a number of public and nonprofit agencies that provide activities, services and programs to assist and support victims of domestic violence (many of them listed in the "You Are Not Alone" brochure), including 24-hour crisis help lines, shelters, counseling services, child abuse services, and medical and legal support. HACM also is a sponsor of the Milwaukee Fatherhood Initiative, which addresses domestic violence in some of its trainings to fathers such as "Nurturing Fathers."

During 2015, HACM will provide updated training for staff and various partners, including: those responsible for determining an applicant's eligibility for housing; those at the housing developments responsible for overseeing resident continued occupancy; Housing Choice Voucher staff; social workers and case managers; and public safety staff involved in intervention. The training will educate staff on the provisions of VAWA; how to obtain information needed from the applicant/resident who is seeking protection under VAWA; and on resources and services available in the Milwaukee area for victims of such violence. Resident Advisory Board members and other key resident leaders will also receive training on how to help victims get connected with services when an actual or threatened domestic abuse incident occurs.

- 7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. *Include statements related to these programs as applicable.*
- (a) Hope VI or Mixed Finance Modernization or Development.

HACM will submit a joint RAD/Choice Neighborhoods Implementation grant application in partnership with the City of Milwaukee to target the Westlawn public housing development (AMP WI002000070) and revitalize the Westlawn neighborhood identified by the following boundaries: N. 76th Street, N. Sherman Blvd, W. Mill Road and W. Villard Ave.

HACM will apply for 2015 low income housing tax credits to support redevelopment activities.

(b) Demolition and/or Disposition

HACM will submit demolition and disposition applications to support its redevelopment activities including the disposition of vacant land in the Hillside Terrace development (AMP WI002000001).

(c) Conversion of Public Housing

HACM will submit a joint RAD/Choice Neighborhoods Implementation grant application in partnership with the City of Milwaukee to target the Westlawn public housing development (AMP WI002000070) and revitalize the Westlawn neighborhood identified by the following boundaries:

N. 76th Street, N. Sherman Blvd, W. Mill Road and W. Villard Ave. HACM will assess the feasibility of converting its other public housing units to project-based voucher units under the Rent Assistance Demonstration program and submit an application if feasible.

(d) Homeownership

HACM currently has approval to administer a homeownership program under the Section 32 Homeownership Program dated June 28, 2006 for the sale of 50 units: 25 units from its Scattered Site inventory of units from AMP#WI002000010P, WI002000016P, WI002000060P, WI002000061P and WI002000063P and 25 units that would be newly constructed or acquired for rehabilitation and sale. As of 7/31/2014, HACM has sold 24 Scattered Site units and acquired/rehabilitated 15 units, of which 11 have been sold. In August 2008, HUD approved an amendment to the plan to include sale of an additional 40 units. As of 7/31/2014, 11 of those units had been sold. HACM has set a goal of selling 5 homes under the homeownership program in 2015. HACM currently has several hundred participants in its program. Participants must be a first time home buyer, must have earned income of at least \$15,000/year, must attend homeownership counseling classes and must not owe child support or any state or local authority. Additional information regarding the homeownership program is provided in the Term Sheet that is available at all administrative offices and housing development offices.

HACM also administers a Section 8(y) Homeownership Program. Similar eligibility criteria exist, with an additional requirement that participants maintain minimum earned income requirements in order to continue mortgage subsidy. Since December 11, 2001, 222 vouchers have been converted from rental to ownership. HACM expects to convert 12 vouchers in 2015. Participants must maintain an earned income level of \$15,000 per year in order to continue receiving mortgage subsidy.

(e) Project-based Vouchers

HACM will continue to look for ways to increase assisted housing choices to families in need through the conversion of public housing to project-based vouchers. Through previous revitalization efforts, public housing units have been converted to project-based vouchers at Highland Garden midrise (34), Cherry Court midrise (50), Becher Terrace (55), Westlawn East (166) and Lapham Park highrise (70). HACM will convert public housing units to project-based vouchers at the Westlawn family development as part of revitalization of that development.

- 8.0 Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.
- **8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report.** As part of the PHA 5-Year and Annual Plan, annually complete and submit the *Capital Fund Program Annual Statement/Performance and Evaluation Report*, form HUD-50075.1, for each current and open CFP grant and CFFP financing.

Form 50075.1 for 2015 Attachment A

The following annual reports for open grants is attached:

2014 CFP Annual 6-30-2014	Attachment C
2013 CFP Annual 6-30-2014	Attachment D
2012 CFP Annual 6-30-2014	Attachment E
2011 CFP Annual 6-30-2014	Attachment F
2010 CFP Final 6-30-2014	Attachment G
2011 CFCF Annual 6-30-2014	Attachment H
2014 RHF #1 Annual 6-30-2014	Attachment I

Narrative Attachment 08: Consistency with Consolidated Plan

Name of Lead Applicant: City of Milwaukee

Name of File: Att08ConsistencyWithConsolPlan

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Con solidated Plan. (Type or clearly print the following information:)

Applicant Name:	City of Milwaukee
Project Name:	Westlawn
ocation of the Project:	N Sherman Blvd to N 76th St, W Mill Road to W.Villard Avenue
	·
Name of the Federal Program to which the applicant is applying:	Choice Neighborhoods Implementation Grant Program
Name of Certifying Jurisdiction:	City of Milwaukee
Certifying Official of the Jurisdiction Name:	Steven L. Mahan
Title:	Director, Community Development Grants Administration
Signature:	
Date:	1/26/15

Name:

Narrative Attachment 09: Eligible Target Housing Documentation – Severe Distress of Targeted Project Certification

Name of Lead Applicant: City of Milwaukee

Name of File: Att09EligTargetHsgDocumentation

CHOICE NEIGHBORHOODS – CERTIFICATION OF SEVERE PHYSICAL DISTRESS

I hereby certify that:
1. I am a licensed engineer \square architect \boxtimes (check one).
2. I am not an employee of the Lead Applicant, Co-Applicant (if any), Principal Team Member (if any), Planning Coordinator (if any) or unit of local government in which the housing project identified below is located.
3. The public and/or assisted housing development listed below meets (in the manner described in either subparagraph A or B below) the following definition of severe physical distress:
Requires major redesign, reconstruction or redevelopment, or partial or total demolition, to correct serious deficiencies in the original design (including inappropriately high population density), deferred maintenance, physical deterioration or obsolescence of major systems, and other deficiencies in the physical plant of the project.
Check one:
A. The development currently meets the above definition of severe physical distress;
Or
B. The development has been legally demolished and HUD has not yet provided replacement housing assistance, other than tenant-based assistance, for the demolished units. However, the development satisfied the definition of severe physical distress (as defined above) as of the day the demolition was approved by HUD.
Name: Lawrence Antoine, AIA, AICP, LEED AP (BD+C)
Signature: Date: 9 February 2015
License number: 0401011573 State of Registration: Virginia
Lead Applicant: The City of Milwaukee
Name of Targeted Public and/or Assisted Housing Site(s):
Westlawn

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

HUD Form 53232 (3/2011)

Name:

Narrative Attachment 10: Eligible Neighborhoods Documentation – Eligible Neighborhoods Data

Name of Lead Applicant: City of Milwaukee

Name of File: Att10EligNeighDocNeighData

MAPPING TOOL DATA FOR FY2014 CHOICE NEIGHBORHOODS IMPLEMENTATION GRANTS

Version - 10/30/2014

Final CNI-Milwaukee

Target Area ID: 9527862

Email of User: skenea@hacm.org

Name of Lead Applicant: HACM

Address of Lead Applicant: 650 W. Reservoir Street Milwaukee WI 53212

Email of Lead Applicant: skenea@hacm.org Name of Target Geography: Final CNI-Milwaukee

Name(s) of target Development(s), as submitted by user to the mapping tool:

Public Housing
Development-1:
Development-2:
Development-3:
Multifamily Assisted
Development-1:
Development-2:

Development-3:

Estimated number of All Housing Units in Target Area (Census 2010): 5549

Is the Target Area County non-Metropolitan (OMB 2009): No

Eligible Neighborhood Threshold:

Section III.A.3.a of the NOFA describes four criteria used to determine whether the target neighborhood meets the Eligible Neighborhood Threshold. This tool provides information on two of the four criteria: (1) and (2b). If you are relying on data on crime, substandard housing, or inadequate schools in order to demonstrate compliance with the Eligible Neighborhoods criteria, you must provide it in the attachments section of your application as instructed in section IV of the NOFA. Refer to the Threshold Requirements section of the NOFA for more information.

(1) at least 20 percent of the households estimated to be in poverty or have extremely low incomes

Target Neighborhood Poverty/ELI Rate (the greater of both rates): 40.32

(2b) high vacancy or substandard homes; defined as where either the most current rate within the last year of long-term vacant or substandard homes is at least 1.5 times higher than that of the city or, where no city data is available, county/parish as a whole; or the rate is greater than 4 percent

Target Neighborhood Vacancy Rate: 11.83 Vacancy Rate In Surrounding County: 5.80

Distress of the Target Neighborhood Rating Factors:

This Mapping Tool provides the data used for 2 of the rating factors under this subheading. See NOFA for awarding of points. Data sources are described at the end of this document.

Neighborhood Poverty:

Concentration of Persons in Poverty in Target Area (ACS 2011) and Concentration of Extremely Low Income (ELI) Households in Target Area (CHAS 2010).

Maximum of previous two criteria, poverty and ELI rate: 40.32

Long-term Vacancy:

Long-term vacancy rate (greater of USPS 2013 / ACS 2011)

In Target Area: 11.83

In Surrounding County/Parish: 5.80

Need for Affordable Housing in the Community Rating Factor:

Estimated Shortage Ratio of Units Affordable to VLI Renter Households (CHAS 2010)

Target Area County ratio: 1.61

National ratio: 1.70

Factors 1 & 2 of Eligibility to Use Tenant Based Vouchers as Replacement Housing:

Refer to section III.C.3.b of the NOFA for information related to the one-for-one replacement of housing requirements.

- (1) located in a county/parish with a loose rental market: No
- (2) located in a Core Based Statistical Area (CBSA) or non-CBSA County where vouchers currently in use are primarily in lower poverty neighborhoods: Yes

Eligible based on factors (1) & (2): No

Data sources and methods:

HUD's mapping tool overlays the locally defined neighborhood/community boundaries with data associated with that area and estimates the rates of certain indicators in that area using a proportional allocation methodology. For metropolitan areas, the tool uses Census block group (as defined for Census 2010) as the smallest statistical boundary for the available data. For non-metropolitan areas, the tool uses census tract data to account for less precision in low-population areas. If the locally defined neighborhood/community is partially within two different Census areas, the data for each factor or threshold criteria are calculated based on the portion of the 2010 housing units located in each Census area. The 2010 housing unit data are available to HUD at the block level and thus can be used as the underlying data to apportion each block group and tract's appropriate share of importance.

For example, based on a user defined geography, 80 percent of the housing units in the locally defined neighborhood/community are in a block group with a poverty rate of 40 percent and 20 percent of the units are in a block group with a poverty rate of 10 percent. The "neighborhood poverty rate" would be calculated as: $(80\% \times 40\%) + (20\% \times 10\%) = 34\%$.

DATA SOURCES:

The data are from a variety of sources:

- 1. **ACS 2011** refers to the US Census American Community Survey 2007-2011 five-year estimates. These are the most recent nationally available data for small geographies at the same Census 2010 boundaries as the other data provided, using a statistical technique that combines five years of data to create reliable estimates for small areas.
- 2. **CHAS 2010** refers to the Comprehensive Housing Affordability Strategy (CHAS) special tabulations HUD receives of Census ACS data. The CHAS data used for this tool are based on ACS 2006-2010 five-year estimates see http://www.huduser.org/portal/datasets/cp.html for more information.
- 3. Census 2010 refers to block-level 2010 decennial counts of housing units
- 4. **USPS 2013** refers to the United States Postal Service long-term vacancy data as of June 30, 2013.

ADDITIONAL NOTES ON SPECIFIC VARIABLES:

Concentration of People in Poverty is calculated with data at the block group level from ACS 2011 for metropolitan areas and the tract level for non-metropolitan areas. This indicator represents the percent of people within the target geography who are below the poverty line. The estimated concentration of Extremely Low Income (ELI) households represents an approximation of the percent of households within the specified area whose household combined income is below 30% of the HUD defined Area Median Income (AMI). This ELI indicator is calculated with data from the block group level from CHAS 2010. The final number included in this report for "poverty rate" is the greater of these two indicators.

Long-term vacancy rates are calculated with data at the block group level with ACS 2011 and the USPS 2013, which ever source produces the greatest percentage.

For the USPS data, HUD calculates the percent of residential addresses (excluding "no-stat" addresses) that are vacant. In the USPS data, a "vacant" address is one that has not had mail picked up for 90 days or longer. The USPS Vacant addresses can also include vacation or migrant labor addresses so HUD uses ACS data to reduce vacancy counts in these cases.

Using the ACS data, HUD calculates the vacancy rate as the percent of housing units that are "other" vacant. These are units not for sale, for rent or vacant for seasonal or migrant housing. This is considered another proxy for long-term vacant housing.

In theory the USPS data should be a stronger measure of distress than the ACS data because they are for 100 percent of the units (ACS is a sample), are more current (ACS aggregates data over a 5 year period), and are intended specifically to capture addresses 90 or more days vacant. However, USPS data are particularly poor at capturing vacancy in rural areas. As such, we use the ACS as a check on the USPS data so that every location gets a vacancy rate based on the greater of their USPS vacancy rate or their ACS 2007-2011 rate. For more information on HUD's USPS dataset, see: http://www.huduser.org/portal/datasets/usps.html

Shortage Ratio of Units Affordable to VLI Renter Households is calculated with data from the CHAS 2010. This indicator is the ratio of very low-income (VLI) renter households (those with household incomes less than 50% of the Area Median Income calculated by HUD) to units affordable and available to these households in the surrounding county or parish. A unit is considered affordable if its rent is no greater than 30% of household incomes in this category, or in other words, 15% of the Area Median Income. A unit is considered available if it is vacant or occupied by a VLI renter household.

Project Map Snapshot for 9527862

