

# THE NSP SUBSTANTIAL AMENDMENT

## REVISED OCTOBER, 2009

Jurisdiction(s): Pinellas County Board of County Commissioners	NSP Contact Person: Sheri Harris Address: 600 Cleveland Street, Suite 800 Clearwater, FL 33755 Telephone: 727-464-8210 Fax: 727-464-8215 Email: sharris@pinellascounty.org
Jurisdiction Web Address: <a href="http://www.pinellascounty.org/community">www.pinellascounty.org/community</a>	

### **SUMMARY**

The Neighborhood Stabilization Program (NSP) was authorized by the Housing and Economic Recovery Act of 2008 (HERA). The NSP funds are to be used to acquire, rehabilitate, demolish, and redevelop foreclosed and abandoned residential properties in order to stabilize neighborhoods.

It has been almost one year since HUD provided the original foreclosure data for the NSP Program. Pinellas County has determined that in order to achieve timeliness for commitment of the funding, it is necessary to expand our targeted areas to census tracts that are contiguous with census tracts within our high risk areas of the County. To date, we have screened over 285 properties that are in our risk areas "9" and "10" and determined 40 properties were candidates for acquisition. Of those 40 properties, we have only been successful in acquiring six properties. This is directly related to investors interested in competing for the same homes. In order to be successful, we need to increase the available inventory of homes. This can only be achieved through expanding the target areas to include certain census tracts located in the "7" priority areas.

#### ***A. AREAS OF GREATEST NEED***

Pinellas County proposes to amend our Action Plan and Consolidated Plan for the purpose of expanding the target areas for the Neighborhood Stabilization Program (NSP) funds from the U.S. Department of Housing and Urban Development (HUD) authorized under Title III of the Housing and Economic Recovery Act of 2008.

Such amendment will allow Pinellas County to increase our service area for committing our NSP allocation of \$8,063,759. Although we are increasing the target area, we will not change the activities that were proposed in the first amendment to the Consolidated Plan; however, Pinellas County has made minimal budget adjustments in each of the identified activities. These adjustments are being made in response to a number of units inspected.

In Pinellas County, the target areas for the Neighborhood Stabilization Program were developed pursuant to the Housing and Economic Recovery Act of 2008, as outlined below, by identifying the census tracts with the:

- Greatest percentage of home foreclosures;
- Highest percentage of homes financed by a sub-prime mortgage related loan; and
- Areas identified as the most likely to face a significant rise in the rate of home foreclosures.

NSP funds must be targeted to the geographic areas of greatest need, which were identified utilizing the detailed foreclosure and pre-foreclosure activity with HUD's foreclosure and abandonment risk score data. The analysis was first based on the greatest percentage of foreclosures to determine that our focus would be on the scores that ranked 10. Our targeting then looked at the highest percentage of homes financed by sub-prime mortgages and finally, we analyzed the data that was provided for foreclosures over the next 18 months and determined that our initial focus would be 9 and 10 risk areas.

If foreclosed properties are not able to be purchased utilizing the discount method that has been established, the County will identify other priority areas with an estimated risk score of 9 for foreclosed and abandoned homes.

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

Based on the data provided by HUD and additional analysis conducted by the County, funding will be distributed to areas of the County identified with an estimated risk score of 10. For the census tract areas that have a high priority ranked as 10, these areas are also ranked as the highest priority based on the highest percentage of subprime mortgage financing and anticipated significant rise in foreclosures over the next 18 months.

The Census tract data provided by HUD indicates that one of the highest priority areas includes our already established target area in Central Lealman. In addition to the Lealman area, Unincorporated Clearwater, Unincorporated Tarpon Springs, Kenneth City, Seminole and Gulfport have been identified as high priority areas.

Through intermediaries, the County will target the NSP funding for purchase and rehabilitation of foreclosed or abandoned properties for resale to income qualified buyers. The estimated funding available for this activity will be \$2,257,383.

The County will also provide funding for the acquisition and rehabilitation of foreclosed or abandoned properties for rental housing that serve families at or below 50% of area median income. The estimated funding for this activity will be \$3,000,000, with \$2,015,939 being set aside for families at or below 50% of area median income. The remaining funding for the rental housing will target families that have incomes less than 120% area median income.

Exhibit C provides Census Tract, Block Group data for high priority areas within the County and describes the County's three tier prioritization approach. Funding for the purchase and rehabilitation of properties was first targeted to the highest priority census tracts that ranked "10".

If the properties identified as "10" do not meet the discount pricing requirements, the County expanded the target areas to include the census tract areas identified as "9" or "10".

If the properties identified as a "10" or a "9" do not meet the discount pricing requirements, Pinellas County expanded the target areas to a third tier for distribution of funds. Those properties located in the priority area identified as "8", "9" or "10" were considered. Pinellas County has been monitoring foreclosure proceedings on a periodic basis in the first and second tier, "9's" and "10's" and has moved to the third tier.

Pinellas County has thoroughly documented foreclosed properties in our “8”, “9”, and “10” priority areas, and determined that our target areas need to be expanded to include census tracts located in risk area “7”. Re-evaluation of the foreclosure data and comparison to the updated data that HUD provided as part of the Neighborhood Stabilization Program Competitive funding cycle, revealed that the hardest hit areas of Pinellas County has spread to contiguous neighborhoods. In order to have significant impact on our neighborhoods, it is essential that we expand our targeted areas to include the Tier 4 census tracts as identified in Exhibit C.

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

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

##### **Entitlement Jurisdiction’s Response:**

For purposes of determining blighted structures to be assisted with the NSP funding, “blighted structure” will be defined as any structure unfit for use, habitation, or dangerous to persons or other property. In addition, a structure is blighted when it exhibits objectively determinable signs of deterioration sufficient to constitute a threat to human health, safety, and public welfare. This includes structures showing evidence of physical decay or neglect, excessive use, or lack of maintenance.

**(2) Definition of “affordable rents.” *Note: Grantees may use the definition they have adopted for their Community Development Block Grant Program (CDBG) but should review their existing definition to ensure compliance with NSP program-specific requirements such as continued affordability.***

##### **Entitlement Jurisdiction’s Response:**

“Affordable rents” shall be defined as the standards established under the HOME Program and referenced in 24 CFR 92.252(a) (b) and (c). Projects identified to serve families at or below 50% AMI will have rents that do not exceed the established rents published annually by HUD.

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

##### **Entitlement Jurisdiction’s Response:**

Pinellas County will ensure long term affordability through the use of a Land Use Restriction Agreements (LURA) for the rental properties and will be recorded against the property. If an owner who has been assisted through this program transfers title to the property before the affordability period expires, the assistance provided by the County will be subject to recapture.

The County will monitor the properties that are assisted with NSP funds during the affordability period to ensure that the specified units are affordable. This will be done utilizing the standards established with the HOME Program. In addition, all properties receiving NSP funding will be secured by a recorded mortgage on the property.

The minimum threshold that will be used to ensure long term affordability will be consistent with the guidelines of the HOME Program as defined in 24 CFR 92.252(e). In some instances, the affordability requirements may be increased at the discretion of Pinellas County based on the amount of subsidy being provided to the recipient.

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

**Entitlement Jurisdiction’s Response:**

Pinellas County will utilize the housing rehabilitation standards, which exceed the minimum code requirements, as described in the Pinellas County Community Development policies. Properties will be rehabilitated to standards that comply with the applicable laws, codes and other requirements of Pinellas County Community Development’s *Minimum Standards for Rehabilitation of Residential Properties*. Pinellas County will incorporate modern, green building and energy-efficiency improvement standards, whenever feasible, to provide for longer-term sustainability.

***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: \$2,015,939.**

***Note:* At least 25% of funds must be used for housing individuals and families whose incomes do not exceed 50 percent of area median income.**

**Entitlement Jurisdiction’s Response:**

Pinellas County will utilize the majority of the 25% set aside for the acquisition and rehabilitation of properties for rental housing that serves households at or below 50% of AMI; however, homeownership opportunities will not be excluded.

Multi-family development projects are defined to include duplexes and triplexes and other existing multi-family properties that meet the definition of abandoned or foreclosed. Since there may be opportunities to acquire and rehabilitate larger multi-family properties that have been foreclosed, if no properties are identified in the level “10” areas, the next highest area will be identified. No foreclosed multi-family properties have been identified in risk score 10, 9, or 8 areas to date. However, the expansion of our target area to include census tracts in Tier 4 may provide an opportunity to acquire affordable rental housing units.

***E. ACQUISITIONS & RELOCATION***

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

**If so, include:**

- **The number of low- and moderate-income dwelling units—i.e., ≤ 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., ≤ 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.**

**Entitlement Jurisdiction’s Response:**

It is difficult to determine whether demolition of foreclosed or abandoned properties will be needed until specific properties are identified. If the cost to rehabilitate the unit exceeds 50% of the acquisition cost, and/or the cost of acquisition and rehabilitation exceeds one hundred percent (100%) loan-to-value, the County will assess the feasibility of demolition.

The budget provides for the demolition of approximately five (5) units; however, if the structures are in satisfactory condition and no demolition is required, the County will move these funds to another activity without amending the plan. The demolition activity will meet the definition of a “blighted structure” as defined in the Amendment.

It is anticipated that the acquisition process will begin in January 2009 or upon executed grant agreements between the County and HUD. Rehabilitation will be provided upon completion of the acquisition of the property. The project will be considered complete when (1) the property is transferred to an eligible homeowner; or, (2) the unit is rented to an eligible tenant.

The County will comply with the Uniform Relocation Act requirements.

***F. PUBLIC COMMENT***

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

**Entitlement Jurisdiction’s Response:**

- The Substantial Amendment to the Action Plan comment period was advertised in the St. Petersburg Times on November 3, 2009 and appeared on the Department website November 3, 2009. The public comment period deadline was November 18, 2009. No comments or concerns were received during the 15 day comment period.

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

**Activity #1**

**(1) Activity Name:** NSP Acquisition and Rehabilitation Program

**(2) Activity Type: (include NSP eligible use & CDBG eligible activity)**

NSP (B) – Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon for resale.

CDBG – 24 CFR 570.201 (a) - Acquisition, 24 CFR 570-202- rehabilitation, and 24 CFR 570-201 (b) Disposition.

**National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., ≤ 120% of area median income).**

24 CFR 570.208 (a) (3) Housing Activities

**(3) Activity Description:**

This activity will address neighborhood stabilization within the identified high priority areas through the purchase of foreclosed properties and rehabilitation and resale of foreclosed properties. All properties acquired under this activity will be 1% less than current market appraised value discount per property.

Intermediaries will be utilized to identify the most current inventory of foreclosed properties within our high priority areas. Negotiations with the lenders will need to meet the requirements established to obtain the required discount for the program.

The purchase of specific foreclosed properties will be dependent upon the highest degree of neighborhood need and the availability of foreclosed properties that can be obtained at a price consistent with the discount requirements of NSP funding. The affordability requirements will meet or exceed the requirements of HOME as follows:

\$15,000	5 years
\$15,000-\$40,000	10 years
>\$40,000	15 years
New Construction	20 years

If a home acquired through this activity is not able to be sold to an eligible homebuyer within a reasonable time, as determined by Pinellas County, the home may be considered for rental to an income qualified person.

**(4) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)**

This activity will be carried out in the target areas as referenced in Section A – Areas of Greatest Need. The specific properties will be evaluated and a final determination based on an analysis of location, amount of rehabilitation, ownership, and other criteria that may affect the affordability and resale ability. If the acquisition of properties within the areas of greatest is not feasible because of financial or economic feasibility and/or don't meet the discount requirements, the next highest priority area within the County will be targeted.

**(5) Performance Measures:**

This activity will provide funding for 12 homes.

**(6) Total Budget:**

It is anticipated that \$2,257,383 will be utilized for the Purchase, Rehabilitation Program. This budget includes acquisition and rehabilitation.

**Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)**

Pinellas County Community Development will be the responsible entity for providing oversight for the implementation of the Homeownership Program. Pinellas County will conduct an analysis of the properties including, but not limited to, financial feasibility, environmental clearance, Lead Based Paint inspections, and other pertinent federal requirements prior to completion of the acquisition.

Contact Information: Pinellas County Community Development  
600 Cleveland Street, Suite 800  
Clearwater, FL 33755  
Anthony Jones, Director  
Telephone: 727-464-8210  
Fax: 727-464-8215

**(7) Projected Start Date:** Upon Grant Agreement Execution

**(8) Projected End Date:** March 2013

**Activity #2**

**(1) Activity Name:** NSP Rental Program

**(2) Activity Type: (include NSP eligible use & CDBG eligible activity)**

NSP (B) – Purchase, rehabilitation and rental of abandoned or foreclosed properties.

24 CFR 570.201 (a) Acquisition; 24 CFR 570.202 Eligible rehabilitation and preservation activities; 24 CFR 570-201 (b) Disposition

**(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., ≤ 120% of area median income).**

24 CFR 570.208 (a) (3) Housing Activities

**(4) Activity Description:**

This activity will address neighborhood stabilization within the high priority areas identified in Exhibit A. Specific neighborhoods will be identified within the census tracts at the time funds are available. The properties will be acquired, rehabilitated and made available as rental property for families below 120% of area median income. Properties will be rehabilitated to standards that comply with the applicable laws, codes and other requirements of Pinellas County Community Development's

*Minimum Standards for Rehabilitation of Residential Properties.* All rehabilitation must be performed by a licensed and insured contractor.

Eligible properties include single family homes and multi-family rental properties that are either abandoned or foreclosed. This could include hotels, motels and short-term accommodations that are determined to be financially feasible. The continued affordability of the properties addressed under this activity will be ensured through land use restriction instruments. All properties acquired under this activity must meet the required purchase discount of at least 1% less than current market appraised value.

The properties will be monitored for continued affordability requirements and affordable rents, consistent with the monitoring standards utilized for HOME funded multi-family properties.

**(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)**

This activity will be carried out in the target areas as referenced in Section A – Areas of Greatest Need. Other Census tracts with equal need, as they are identified over the course of the program will be evaluated for participation in the program.

**(6) Performance Measures**

It is estimated that 35 units will be acquired and rehabilitated for rental properties, targeting families that are below 120% of the area median family income.

**(7) Total Budget:**

\$3,000,000 will be utilized for acquisition, rehabilitation, and occupancy as rental property.

**(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)**

Pinellas County Community Development will provide project management oversight throughout the implementation of the NSP rental program.

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Telephone: 727-464-8210  
Fax: 727-464-8215

**(9) Projected Start Date: Upon Grant Agreement Execution**

**(10) Projected End Date: March 2013**

**Activity #3**

**(1) Activity Name: NSP Demolition Program**

**(2) Activity Type: (include NSP eligible use & CDBG eligible activity)**

NSP (D) – Demolish blighted structures and NSP (E) – Redevelop demolished or vacant properties. CDBG – 24 CFR 570.201 (a) Acquisition; 24 CFR 570.201 (b) Disposition; 24 CFR 570.201(d) – Clearance for blighted structures only; new housing construction.

**(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., ≤ 120% of area median income).**

24 CFR 570.208 (a) (3) Housing Activities

**(4) Activity Description:**

This activity will address neighborhood stabilization within the identified target areas by removing blighted structures and through the redevelopment of demolished or vacant properties. Properties under this activity may be redeveloped with housing that will become part of the Homeownership Program or the Rental Program.

Property addressed under this activity that meet the NSP Plan’s definition of blighted are exempt from the requirement that the property must be foreclosed or abandoned. Eligible costs under this activity include, but are not limited to, costs associated with acquisition, demolition, clearance and redevelopment of the site.

Eligible homebuyers for the newly constructed home will be required to complete an eight (8) hour HUD approved homebuyer counseling class. Multi-family projects will be monitored in a manner consistent with HOME regulations. The tenure of the beneficiaries of this activity can be either that of rental or homeownership.

**(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)**

This activity will be carried out in the target areas as referenced in Section A – Areas of Greatest Need and other census tracts with equal need, as they are identified throughout the program.

**(6) Performance Measures:**

Funding is available for 9 homes; however, if properties do not require demolition, the funds will be adjusted to another activity without amending the plan.

**(7) Total Budget:**

\$900,000 has been set aside for demolition of blighted structures.

**(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)**

Pinellas County Community Development will work with intermediaries to implement this activity and provide project management oversight.

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(9) **Projected Start Date:** Upon Grant Agreement Execution

(10) **Projected End Date:** March 2013

#### **Activity #4**

(1) **Activity Name:** NSP Land Bank Program

(2) **Activity Type:** (include NSP eligible use & CDBG eligible activity)

NSP (C) – Establish land banks for homes that have been foreclosed.

(3) **National Objective:** (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., ≤ 120% of area median income).

24 CFR 570.208 (a) (3) Housing Activities

(4) **Activity Description:**

This activity will allow the establishment of a land bank for foreclosed homes. Properties acquired for land banking will become part of the NSP Rental Program, NSP Homeownership Program or the NSP Demolition and Redevelopment Program. The tenure of the beneficiaries of this activity can be either that of rental or homeownership.

There will be three primary methods for the disposition of property through the Housing Finance Authority. One method will be used for scattered infill parcels, a second method for existing homes or structures, and the third method for parcels that could be developed for more than 3 dwelling units. Small scattered site parcels will be disposed of through a Request for Proposal process; for existing structures, the method will be sealed bid, lottery or request for negotiation; for large parcels, the process will be through Request for Negotiations.

(5) **Location Description:** (Description may include specific addresses, blocks or neighborhoods to the extent known.)

This activity will be carried out in the target areas as referenced in Section A – Areas of Greatest Need.

(6) **Performance Measures:**

It is anticipated that 2 units would be acquired for the Land Bank activity.

**(7) Total Budget:**

\$100,000 of NSP funds will be targeted to properties for this activity. If the funds are not required for this activity, they will be reassigned to another activity without amending the plan.

**(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)**

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**(9) Projected Start Date: Upon Grant Agreement Execution**

**(10) Projected End Date: March 2013**

**Activity #5**

**(1) Activity Name: NSP Direct Homeownership Assistance**

**(2) Activity Type: (include NSP eligible use & CDBG eligible activity)**

NSP Eligible Use (A) Establish financing mechanisms for purchase and redevelopment of foreclosed homes.

24 CFR 570.201 (n) - Direct Homeownership Assistance

**(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., ≤ 120% of area median income).**

24 CFR 570.208 (a) (3) Housing Activities

**(4) Activity Description:**

This activity will address neighborhood stabilization within the identified high priority areas through direct assistance to eligible homebuyers of properties redeveloped under this plan. The assistance will be in the form of direct down payment assistance, payment assistance to secure private mortgage insurance, and finance acquisition.

Any down payment assistance provided will not to exceed 50% and the remaining will be required from the homebuyer. This activity also allows for the payment of all, or part of, costs required up front for the buyer to obtain necessary private mortgage insurance.

Additionally, this activity will allow for the development of financing mechanisms designed to reduce the cost of acquisition to the buyer.

**(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)**

This activity will be carried out in the target areas as referenced in Section A – Areas of Greatest Need.

**(6) Performance Measures:**

20 households will be provided financial assistance.

**(7) Total Budget:**

\$1,000,000 of NSP funds will be targeted to households at less than 120% of area median income for this activity. If the funds are not required for this activity, they will be reassigned to another activity without amending the plan.

**(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)**

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Anthony Jones, Director  
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Fax: 727-464-8215

**(9) Projected Start Date: Upon Grant Agreement Execution**

**(10) Projected End Date: March 2013**

**Activity #6**

**(1) Activity Name: NSP Administration**

**(2) Activity Type: (include NSP eligible use & CDBG eligible activity)**

NSP allows 10% of initial allocation and 10% of program income, to be used for general administration and planning activities (Federal Register, Vol. 73, No. 194, II. H.)

CDBG – 24 CFR 570.205 and 24 CFR 570.206

**(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., ≤ 120% of area median income).**

To administer activities that benefit low and moderate income persons under 24 CFR 570.208 (a) (2) and potentially under 24 CFR 570.208 (a) (1) (up to 120% of Median Family Income permitted under NSP)

**Activity Description:**

This activity will provide the general administration and planning activities required to receive NSP funding and successfully implement the activities identified in the NSP program.

**(4) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)**

This activity will be carried out in the census tracts identified in Exhibit A; other Census tracts may have equal need, as they are identified when implementing the programs.

**(5) Performance Measures:**

Pinellas County will complete planning activities to receive NSP funds and NSP funds will be accurately administered.

**(6) Total Budget:**

\$806,376 of the NSP funds allocated to Pinellas County will be utilized over the five year program period, beginning with pre-award activities as of September 29, 2008.

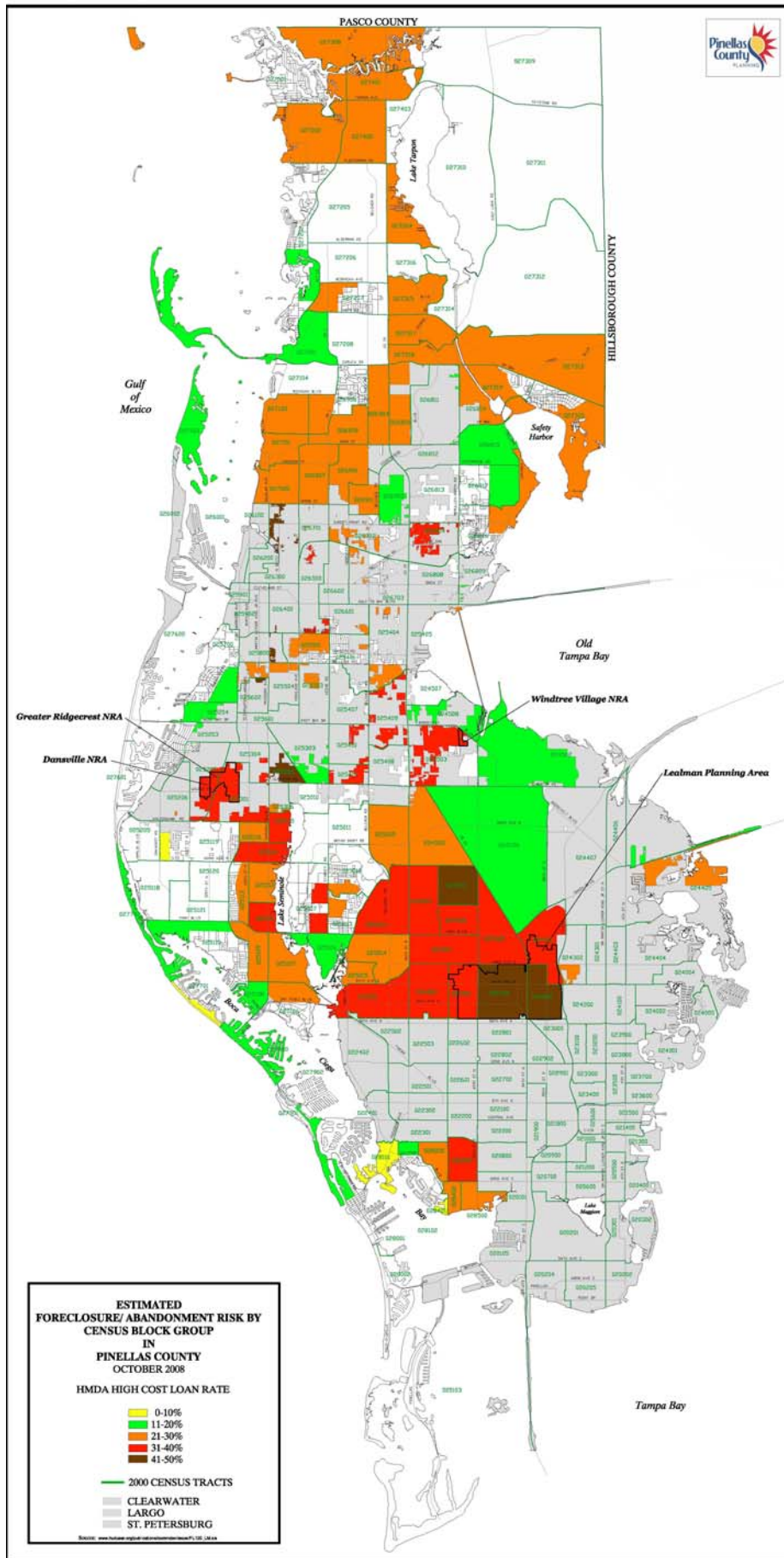
**(7) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)**

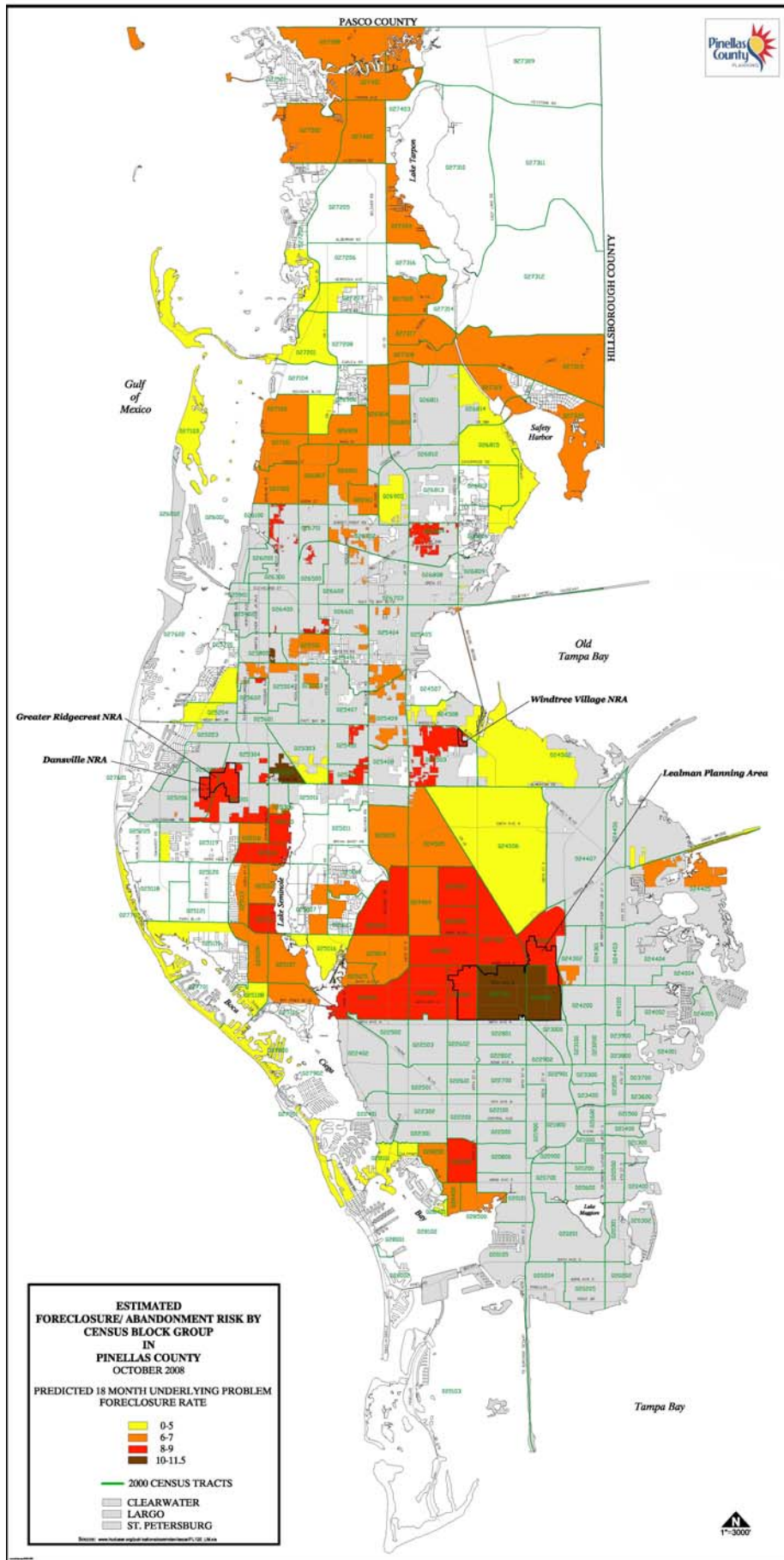
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**(8) Projected Start Date: September 29, 2008 (Federal Register, Vol. 73, No. 194, II. C. allows reimbursement for pre-award costs.**

**(9) Projected End Date: July 30, 2013**







**EXHIBIT B**

**PINELLAS COUNTY  
NEIGHBORHOOD STABILIZATION PROGRAM BUDGET**

<b>ACTIVITY</b>	<b>AMOUNT</b>	<b>&lt; 50% AMOUNT</b>	<b>51-120% AMOUNT</b>	<b>Total \$</b>	<b>Units</b>
Acquisition-Rehabilitation	\$2,257,383	\$0	\$2,257,383	\$2,257,383	12
Acquisition-Rehabilitation-Rental	\$3,000,000	\$2,015,939	\$984,061	\$2,015,939	35
Acquisition-Demolition-Redevelopment	\$900,000		\$900,000	\$900,000	9
Land Bank	\$100,000	\$0	\$100,000	\$100,000	2
Direct Homeownership Assistance	\$1,000,000	\$0	\$1,000,000	\$1,000,000	20
Planning and Administration	\$806,376	\$0	\$0	\$806,376	
<b>Total</b>	<b>\$8,063,759</b>	<b>\$2,015,939</b>	<b>\$5,241,444</b>	<b>\$8,063,759</b>	<b>74</b>

**EXHIBIT C  
HIGH PRIORITY AREAS**

**TIER 1 - "10"**

Location	Tract	Blkgrp	Areas Of Past Redevelopment
Unincorporated St. Pete/Lealman	24602	3, 4, 5	
Unincorporated Lealman	24700	1, 2, 3, 4, 5	Central Lealman Target Area
Unincorporated Clearwater	25800	1	
Unincorporated Clearwater	25602	1	
Unincorporated Clearwater	26400	5	
Unincorporated Clearwater	26300	1, 3, 4	
Unincorporated Clearwater	25115	1, 2	
Unincorporated Clearwater	26804	1, 2	
City of Gulfport	28300	1, 2, 3, 4	
Unincorporated St. Pete/Lealman	25001	1, 2, 3	
Unincorporated Clearwater	26500	2, 6	
Unincorporated Seminole	25111	1	
City of Seminole	25111	1	
Unincorporated St. Pete/Lealman	24801	1, 2	
Town of Kenneth City	24801	1, 2	
Unincorporated Largo	25304	2	
Unincorporated Largo	25409	1	
Unincorporated Tarpon Springs	27401	1	
City of Tarpon Springs	27401	1, 2	
Unincorporated Seminole	25112	1, 2	
City of Seminole	25112	1, 2, 3	

**TIER 2 - "9"**

Location	Tract	Blkgrp	Areas Of Past Redevelopment
Unincorporated Dansville	025207	2, 3	Dansville NRA
Unincorporated Dansville/Greater Ridgecrest Area	025207	2	Dansville/Greater Ridgecrest NRA
Unincorporated Greater Ridgecrest Area	025301	1, 2, 3	Greater Ridgecrest NRA
Unincorporated Tarpon Springs	027402	3, 4	Union Academy Neighborhood
City of Tarpon Springs	027402	1, 2, 3, 4	Union Academy Neighborhood
Unincorporated St. Petersburg	024302	3	
Unincorporated St. Petersburg	024405	2, 3	
Unincorporated Pinellas Park	024601	1, 2	
City of Pinellas Park	024601	1	
Unincorporated Pinellas Park	024802	1, 2, 3	
City of Pinellas Park	024802	1, 2	
Town of Kenneth City	024802	1, 2, 3	
City of Pinellas Park	024901	1, 2, 3	
City of Pinellas Park	024902	1, 2, 3, 4	

City of Pinellas Park	024904	1	
City of Pinellas Park	024905	1, 2, 3	
City of Pinellas Park	024906	1, 2, 3	
Unincorporated Pinellas Park	025004	1, 3, 4	
City of Pinellas Park	025004	1, 2, 3, 4	
Unincorporated Largo	025012	2	
Unincorporated Largo	025013	2	
Unincorporated St. Petersburg	025015	1	
Unincorporated Seminole	025106	1, 2	
City of Seminole	025106	1, 2	
Unincorporated Seminole	025109	1, 2	
City of Seminole	025109	1, 2	
City of Seminole	025114	1	
Unincorporated Seminole	025114	2	
Unincorporated Largo	025116	1, 2	
Unincorporated Largo	025206	2	
Unincorporated Largo	025305	1	
Unincorporated Largo	025306	1	
Unincorporated Clearwater	025405	1	
Unincorporated Clearwater	025504	1, 2	
Unincorporated Clearwater	026701	1, 3	
Unincorporated Clearwater	026703	1	
City of Dunedin	027000	1, 2, 3, 4	
City of Dunedin	027000	2, 4	
Unincorporated Dunedin	027101	1	
City of Dunedin	027101	1, 2, 3	
City of Dunedin	027105	1	
Unincorporated Palm Harbor	027204	1, 2	
City of Gulfport	028200	1, 2, 3	
City of Gulfport	028500	1, 2	

**TIER 3 – “8”**

Location	Tract	Blkgrp	Areas Of Past Redevelopment
	025007	2	
City of Seminole	025007	3	
	025108	1, 2	
City of Seminole	025108	2	
	025119	1	
City of Belleair Bluffs	025203	1	
	025204	1	
City of Belleair Bluffs	025204	1,2	
	025303	1	
	025401	2	
	025404	1	

	025404	7	
	025410	1	
	025501	1, 2	
	025503	1	
	026601	4	
	026702	3,4	
	026810	1,2	
	026811	3	
	026816	1	
City of Safety Harbor	026816	1,2,3	
	026905	2,3,4	
	026907	2	
City of Dunedin	026907	1,2	
City of Dunedin	026908	3	
	026909	1	
City of Dunedin	026909	1	
	026910	2,3	
	026911	1	
City of Dunedin	027103	1	
City of Dunedin	027201	1,2	
	027202	3	
	027202	5	
City of Tarpon Springs	027501	3	
	027502	1	
	027502	2	
City of Tarpon Springs	027502	1,2	
City of Gulfport	028402	1,2	

**TIER 4 - "7"**

Location	Tract	Blkgrp	Areas Of Past Redevelopment
	024502	1	
Pinellas Park	024505	1,2,3	
Pinellas Park	024506	1,2,3,4	
Pinellas Park	025014	1,2	
	025110	2	
	025113		
Unincorporated Belleair	025700	4	
	026817	2	
	027207	2,3,4	
City of South Pasadena	028102	1	
	027311		

# CERTIFICATIONS

- (1) **Affirmatively furthering fair housing.** The jurisdiction will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-lobbying.** The jurisdiction will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (3) **Authority of Jurisdiction.** The jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (4) **Consistency with Plan.** The housing activities to be undertaken with NSP funds are consistent with its consolidated plan, which means that NSP funds will be used to meet the congressionally identified needs of abandoned and foreclosed homes in the targeted area set forth in the grantee's substantial amendment.
- (5) **Acquisition and relocation.** The jurisdiction will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the Notice for the NSP program published by HUD.
- (6) **Section 3.** The jurisdiction will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (7) **Citizen Participation.** The jurisdiction is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (8) **Following Plan.** The jurisdiction is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.
- (9) **Use of funds in 18 months.** The jurisdiction will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008 by using, as defined in the NSP Notice, all of its grant funds within 18 months of receipt of the grant.
- (10) **Use NSP funds  $\leq$  120 of AMI.** The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.
- (11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source

other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

(12) **Excessive Force.** The jurisdiction certifies that it has adopted and is enforcing: (1) a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and (2) a policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.

(13) **Compliance with anti-discrimination laws.** The NSP grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

(14) **Compliance with lead-based paint procedures.** The activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.

(15) **Compliance with laws.** The jurisdiction will comply with applicable laws.

\_\_\_\_\_  
Signature/Authorized Official

\_\_\_\_\_  
Date

Calvin D. Harris – Chairman  
Name/Title