

**NEIGHBORHOOD STABILIZATION PROGRAM 3
SUBSTANTIAL AMENDMENT
TO
2011-2015 CONSOLIDATED STRATEGIC PLAN
2010-2011 ANNUAL ACTION PLAN**



APPLICATION FOR FEDERAL ASSISTANCE

OMB Approved No. 3076-0006

Version 7/03

1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction		2. DATE SUBMITTED 3/1/2011	Applicant Identifier
Pre-application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		3. DATE RECEIVED BY STATE	State Application Identifier
		4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier
5. APPLICANT INFORMATION			
Legal Name: Pinellas County		Organizational Unit: Department: Community Development Department	
Organizational DUNS: 05-520-0216		Division: Compliance	
Address: Street: 600 Cleveland Street, Suite 800		Name and telephone number of person to be contacted on matters involving this application (give area code) Prefix: First Name: Anthony	
City: Clearwater		Middle Name	
County: Pinellas		Last Name Jones	
State: Florida	Zip Code 33755	Suffix:	
Country: U.S.A		Email: ajones@pinellascounty.org	
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 59-6000800		Phone Number (give area code) 727-464-8210	Fax Number (give area code) 727-464-8254
8. TYPE OF APPLICATION: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) <input type="checkbox"/> <input type="checkbox"/> Other (specify)		7. TYPE OF APPLICANT: (See back of form for Application Types) County Other (specify)	
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 14-218		9. NAME OF FEDERAL AGENCY: US Department of Housing and Urban Development	
TITLE (Name of Program): Community Development Block Grant/Entitlement Grants - NSP3		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Neighborhood Stabilization Program 3	
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): Pinellas County			
13. PROPOSED PROJECT Start Date: 4/15/2011 Ending Date: 4/15/2014		14. CONGRESSIONAL DISTRICTS OF: a. Applicant 9 & 10 b. Project 9 & 10	
15. ESTIMATED FUNDING:		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?	
a. Federal	\$ 4,697,519.00	a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE:	
b. Applicant	\$.00	b. No. <input checked="" type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372	
c. State	\$.00	<input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW	
d. Local	\$.00	17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?	
e. Other	\$.00	<input type="checkbox"/> Yes If "Yes" attach an explanation. <input type="checkbox"/> No	
f. Program Income	\$.00		
g. TOTAL	\$.00		
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.			
a. Authorized Representative			
Prefix Last Name Latvala	First Name Susan	Middle Name Suffix	
b. Title Chair, Pinellas County Board of County Commissioners		c. Telephone Number (give area code) 727-464-3377	
d. Signature of Authorized Representative		e. Date Signed	

NSP3 Grantee Information

NSP3 Program Administrator Contact Information	
Name (Last, First)	Harris, Sheri
Email Address	sharris@pinellascounty.org ; County website: www.pinellascounty.org
Phone Number	727-464-8245
Mailing Address	600 Cleveland Street Suite 800, Clearwater, FL 33755

1. Areas of Greatest Need

Map Submission

The maps generated at the HUD NSP3 Mapping Tool for Preparing Action Plan website are included as Exhibits.

Data Sources Used to Determine Areas of Greatest Need

Describe the data sources used to determine the areas of greatest need.
<p>Pinellas County proposes to amend our 2010-2011 Action Plan and 2011-2015 Consolidated Plan for the purpose of fulfilling the requirements to receive Neighborhood Stabilization Program (NSP) funds from the U.S. Department of Housing and Urban Development (HUD). Such amendment will allow Pinellas County to receive an allocation of \$4,697,519 to be used for the purpose of acquiring and redeveloping foreclosed and abandoned properties within the high priority areas of the County. It is anticipated that program income from these activities will occur and be utilized for additional NSP activities. Exhibit A provides the proposed budget for implementation of NSP3 funding.</p> <p>In Pinellas County, the target areas for the Neighborhood Stabilization Program were developed utilizing the HUD NSP3 Downloadable Data Files and identified properties identified with the Land Use Codes for the County. The identified neighborhoods had a risk score of 20, with 20 being the maximum possible.</p>

Determination of Areas of Greatest Need and Applicable Tiers

Describe how the areas of greatest need were established and whether a tiered approach is being utilized to determine the distribution of funding.
<p>The target areas for the Neighborhood Stabilization Program were developed by identifying the census tracts with the:</p> <ul style="list-style-type: none">• 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. <p>The analysis was based on the greatest percentage of foreclosures to determine that our focus would be on the scores that ranked 20. Our targeting then looked at the highest percentage of homes financed by sub-prime mortgages and foreclosures started over the past year. Pinellas County will also consider homes that meet the expanded definition of foreclosed which includes properties that have owners behind on their mortgage more than 60 days or delinquent on taxes.</p> <p>Priority Area 1 is Central Lealman. This neighborhood has a total of 4,272 housing units, with 63 percent of the persons having incomes less than 80% of Area Median Income. According to the data provided</p>

with the HUD Mapping Tool, 31 properties will need either rehabilitation or redevelopment in order to have an impact on stabilizing the neighborhood.

Priority Area 2 is East Lealman. This neighborhood has a total of 4,451 housing units in the neighborhood, with 60 percent of the persons having incomes less than 80% of Area Median Income. According to the data provided with the HUD Mapping Tool, 19 properties will need either rehabilitation or redevelopment to have an impact on stabilizing the neighborhood.

According to the data provided by the County, these two priority areas have 126 multi-family units with a land use code that signifies 4-9 units per structure. In addition, there are 630 duplexes and 176 triplexes within the neighborhood. There are also some larger developments which include 552 units with 50 or more units within the development and 244 units with 10-49 units within the development.

Although there are a large number of multi-family rental units within the Lealman area, it will be important to identify those rental units that are currently in foreclosure. The rental program will be a priority of the County; however single-family acquisition and rehabilitation will also be completed. Data collected from NSP acquisitions have indicated that although there are numerous duplexes and triplexes classified as rental property, investors are getting to the properties before we are able to secure them.

Pinellas County will consider neighborhoods with Need Scores of 19 if we are not able to secure properties that have a Need Score of 20 within these census tracts.

2. Definitions and Descriptions

Definitions

Term	Definition
Blighted Structure	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.
Affordable Rents	"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.

Descriptions

Term	Definition
Long-Term Affordability	<p>Pinellas County will ensure long term affordability through the use of Land Use Restriction Agreements (LURA) that 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.</p> <p>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</p>

	HOME Program. In addition, all properties receiving NSP funding will be secured by a recorded mortgage on the property. The <u>minimum</u> 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.
Housing Rehabilitation Standards	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 <i>Minimum Standards for Rehabilitation of Residential Properties</i> . Pinellas County will incorporate modern, green building and energy-efficiency improvement standards, whenever feasible, to provide for longer-term sustainability.

3. Low-Income Targeting

Low-Income Set-Aside Amount

Enter the low-income set-aside percentage in the first field. The field for total funds set aside will populate based on the percentage entered in the first field and the total NSP3 grant.

Identify the estimated amount of funds appropriated or otherwise made available under the NSP3 to be used to provide housing for individuals or families whose incomes do not exceed 50 percent of area median income.

Response:

Total low-income set-aside **percentage** (must be no less than 25 percent): **25%**

Total funds set aside for low-income individuals = **\$1,174,379.75**

Meeting Low-Income Target

Provide a summary that describes the manner in which the low-income targeting goals will be met.

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. In addition, rental properties that are acquired will be considered mixed income developments.

4. Acquisition and Relocation

Demolition or Conversion of LMI Units

Does the grantee intend to demolish or convert any low- and moderate-income dwelling units (i.e., ≤ 80% of area median income)?	Yes
---	-----

If yes, fill in the table below.

Question	Number of Units
----------	-----------------

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.	5
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).	5
The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.	0

5. Public Comment

Citizen Participation Plan

Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment or abbreviated plan.
In accordance with the waiver provided by HUD to reduce the Citizen Participation Plan, Pinellas County advertised in the St. Petersburg Times and a notice was placed on the Department website. The comment period was January 19, 2011 to February 2, 2011. In addition, all quarterly progress reports will be posted on the Department website.

Summary of Public Comments Received.

The summary of public comments received is included as Exhibit C and provides a summary of the comments received and how each of the comments was addressed.

6. NSP Information by Activity

Enter each activity name and fill in the corresponding information. If you have fewer than seven activities, please delete any extra activity fields. (For example, if you have three activities, you should delete the tables labeled “Activity Number 4,” “Activity Number 5,” “Activity Number 6,” and “Activity Number 7.” If you are unsure how to delete a table, see the instructions [above](#).

The field labeled “Total Budget for Activity” will populate based on the figures entered in the fields above it.

Consult the [NSP3 Program Design Guidebook](#) for guidance on completing the “Performance Measures” component of the activity tables below.

Activity Number 1											
Activity Name	Single Family Acquisition and Rehabilitation Program										
Uses	Select all that apply: <table border="1"> <tr> <td><input type="checkbox"/></td><td>Eligible Use A: Financing Mechanisms</td></tr> <tr> <td><input checked="" type="checkbox"/></td><td>Eligible Use B: Acquisition and Rehabilitation</td></tr> <tr> <td><input type="checkbox"/></td><td>Eligible Use C: Land Banking</td></tr> <tr> <td><input type="checkbox"/></td><td>Eligible Use D: Demolition</td></tr> <tr> <td><input type="checkbox"/></td><td>Eligible Use E: Redevelopment</td></tr> </table>	<input type="checkbox"/>	Eligible Use A: Financing Mechanisms	<input checked="" type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation	<input type="checkbox"/>	Eligible Use C: Land Banking	<input type="checkbox"/>	Eligible Use D: Demolition	<input type="checkbox"/>	Eligible Use E: Redevelopment
<input type="checkbox"/>	Eligible Use A: Financing Mechanisms										
<input checked="" type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation										
<input type="checkbox"/>	Eligible Use C: Land Banking										
<input type="checkbox"/>	Eligible Use D: Demolition										
<input type="checkbox"/>	Eligible Use E: Redevelopment										
CDBG Activity or	CDBG – 24 CFR 570.201 (a) - Acquisition; 24 CFR 570.202- Eligible										

Activities	rehabilitation and preservation activities; and 24 CFR 570.201 (b) Disposition									
National Objective	Low Moderate Middle Income Housing (LMMH)									
Activity Description	<p>Housing Market and Goals: Pinellas County has a high foreclosure rate and home values have dropped and neighborhoods are deteriorating as a result. Some areas are stabilizing; however the Lealman area continues to be an area of need and requires assistance. The goal of Pinellas County is to revitalize the greatest need areas by improving the housing stock and stabilizing declining markets in the high priority areas.</p> <p>All properties acquired under this activity must meet the minimum 1% less than current market appraised value discount per property.</p> <p>Capacity: Pinellas County has a strong system in place for completion of the activities and will be accomplished through the Housing Finance Authority of Pinellas County. The County has established a successful model in NSP1 for working with the Housing Finance Authority to purchase foreclosed single-family homes and rehabilitate them for resale to income eligible buyers.</p> <p>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 maximum reasonable discount for the program.</p> <p>The purchase of specific foreclosed properties will be dependent upon the highest need within the neighborhood and the availability of foreclosed properties that can be obtained at a price consistent with the discount requirements of NSP funding. The <u>minimum</u> affordability requirements will be consistent with the requirements of HOME.</p> <table><tr><td>\$15,000</td><td>5 years</td></tr><tr><td>\$15,000-\$40,000</td><td>10 years</td></tr><tr><td>>\$40,000</td><td>15 years</td></tr><tr><td>New Construction</td><td>20 years</td></tr></table> <p>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 occupancy to an income qualified family.</p>		\$15,000	5 years	\$15,000-\$40,000	10 years	>\$40,000	15 years	New Construction	20 years
	\$15,000	5 years								
	\$15,000-\$40,000	10 years								
	>\$40,000	15 years								
	New Construction	20 years								
	Location Description	<p>The single family acquisitions will be completed in the Central and East Lealman neighborhoods as the highest priority. These were identified using the HUD mapping tool and are designated as “20”. Census tracts with a score of “19” that surround the neighborhood will be considered if the area needs to be expanded for meeting the expenditure deadlines.</p>								
	Budget	Source of Funding	Dollar Amount							
		NSP3	\$750,000							
		(Other funding source)	\$0							
		(Other funding source)	\$0							
Total Budget for Activity		\$750,000								

Performance Measures	The primary performance measure will be the number of units acquired and rehabilitated within the neighborhoods. Based on average acquisition and rehabilitation costs associated with NSP1, it is estimated that 5 homes will be acquired for rehabilitation and resale to families with incomes <120% of Area Median Income.	
Projected Start Date	4/15/2011	
Projected End Date	4/15/2014	
Responsible Organization	Name	Pinellas County
	Location	600 Cleveland Street, Suite 800 Clearwater FL 33755
	Administrator Contact Info	727-464-8245 sharris@pinellascounty.org

Activity Number 2	
Activity Name	Multi-Family Development Program
Use	Select all that apply: <input type="checkbox"/> Eligible Use A: Financing Mechanisms <input checked="" type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation <input type="checkbox"/> Eligible Use C: Land Banking <input type="checkbox"/> Eligible Use D: Demolition <input type="checkbox"/> Eligible Use E: Redevelopment
CDBG Activity or Activities	CDBG - 24 CFR 570.201 (a) Acquisition; 24 CFR 570.202 Eligible rehabilitation and preservation activities; and 24 CFR 570.201 (b) Disposition
National Objective	Low Moderate Middle Income housing and Low Income housing and 25% set aside for <50% LM25
Activity Description	<p>This activity will address neighborhood stabilization within the high priority areas identified in Exhibit B. The properties will be acquired, rehabilitated and made available as rental property for families that are below 50% 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 <i>Minimum Standards for Rehabilitation of Residential Properties</i>. All rehabilitation must be performed by a licensed and insured contractor.</p> <p>Housing Market and Goals: Pinellas County has seen home values decrease and the need for rental properties has increased. Some of this is largely due to the high unemployment rate for the area, resulting in a need for affordable rental housing. Central and East Lealman areas continue to be areas of need and require assistance. The goal of Pinellas County is to revitalize the greatest need areas by preserving the number of rental units available to families below 120% of Area Median Income.</p> <p>Capacity: Pinellas County has developed strong partnerships with our local non-profit developers that have the capacity to acquire and rehabilitate multi-family developments. In addition, several of these non-profit developers currently have units in close proximity to the target area that they are currently managing as affordable rental housing.</p>

	<p>Eligible properties include single family homes and multi-family rental properties that are either abandoned or foreclosed. 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 5% less than current market appraised value and must be as high as required to keep the total NSP portfolio within the required purchase discount level.</p> <p>The properties will be monitored for continued affordability requirements and affordable rents, consistent with the monitoring standards utilized for HOME funded multi-family properties.</p>	
Location Description	<p>The Rental Program will be completed in the Central and East Lealman neighborhoods that have been identified as the highest priority. These were identified using the HUD mapping tool and are designated as "20". Census tracts with a score of "19" that surround the neighborhood will be considered if the area needs to be expanded for meeting the expenditure deadlines.</p>	
Budget	Source of Funding	Dollar Amount
	NSP3	\$1,852,767.10
	(Other funding source)	\$0
	(Other funding source)	\$0
Total Budget for Activity		\$1,852,767.10
Performance Measures	<p>The performance measure will be the number of units acquired and rehabilitated within the neighborhoods. The focus will be on existing multi-family units that are occupied by families and need rehabilitation. We will utilize existing partnerships with Developers that had partnered with the County in the past. Based on average acquisition and rehabilitation costs associated with NSP1, it is estimated that 25 units will be acquired for rehabilitation and occupied by families with mixed incomes. This activity will be used to meet the 25% set aside for families at less than 50% Area Median Income.</p>	
Projected Start Date	4-15-2011	
Projected End Date	4-15-2014	
Responsible Organization	Name	Pinellas County
	Location	600 Cleveland Street, Suite 800, Clearwater, FL 33755
	Administrator Contact Info	727-464-8245

Activity Number 3	
Activity Name	Homeownership Financing
Use	Select all that apply:
	<input checked="" type="checkbox"/> Eligible Use A: Financing Mechanisms
	<input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/> Eligible Use C: Land Banking
	<input type="checkbox"/> Eligible Use D: Demolition
	<input type="checkbox"/> Eligible Use E: Redevelopment
CDBG Activity or Activities	CDBG - 24 CFR 570.201 (n) - Direct Homeownership Assistance

National Objective	Low Moderate Middle Income Housing (LMMH)	
Activity Description	<p>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 soft second financing, payment assistance to secure private mortgage insurance, loan loss reserves, shared equity, and finance acquisition.</p> <p>This activity will specifically provide homebuyer assistance not to exceed 50% of the value. This assistance will be provided in the form of a zero percent (0%) interest deferred loan. Loans will be deferred for a period not to exceed five (5) years. 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.</p> <p>Capacity: Pinellas County has experience with operating numerous down payment programs and provides soft second mortgages to families through other funding sources. The assistance that is provided with this activity has been provided by the County with previous programs, so implementation will be similar and will target families with incomes less than 120% of Area Median Income.</p>	
Location Description	Financing will be provided to families interested in purchasing the rehabilitated or redeveloped homes located in the Central and East Lealman neighborhoods that have been identified as the highest priority. These were identified using the HUD mapping tool and are designated as "20". Census tracts with a score of "19" that surround the neighborhood will be considered if the area needs to be expanded for meeting the expenditure deadlines.	
Budget	Source of Funding	Dollar Amount
	NSP3	\$250,000
	(Other funding source)	\$0
	(Other funding source)	\$0
Total Budget for Activity		\$250,000
Performance Measures	The performance measure will be the number of units acquired and rehabilitated within the neighborhoods. It is anticipated that the average assistance to a buyer will be approximately \$25,000. It is estimated that 10 buyers will receive financial assistance.	
Projected Start Date	4-15-2011	
Projected End Date	4-15-2014	
Responsible Organization	Name	Pinellas County
	Location	600 Cleveland Street, Suite 800, Clearwater, FL 33755
	Administrator Contact Info	727-464-8245 sharris@pinellascounty.org

Activity Number 4	
Activity Name	Acquisition and Demolition
Use	Select all that apply:

	<input type="checkbox"/> Eligible Use A: Financing Mechanisms <input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation <input type="checkbox"/> Eligible Use C: Land Banking <input checked="" type="checkbox"/> Eligible Use D: Demolition <input type="checkbox"/> Eligible Use E: Redevelopment								
CDBG Activity or Activities	CDBG – 24 CFR 570.201 (a) Acquisition; 24 CFR 570.201 (d) Clearance for blighted structures only; and 24 CFR 570.201 (b) Disposition								
National Objective	Low Moderate Middle Income Housing (LMMH)								
Activity Description	This activity will address neighborhood stabilization within the identified target area by removing blighted structures that are beyond repair. Properties that are demolished will be redeveloped with affordable housing that will serve households below 120% of area median income. 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, and clearance.								
Location Description	Acquisition and demolition of properties will be completed within the Central and East Lealman neighborhoods that have been identified as the highest priority. These were identified using the HUD mapping tool and are designated as "20". Census tracts with a score of "19" that surround the neighborhood will be considered if the area needs to be expanded for meeting the expenditure deadlines.								
Budget	<table border="1"> <tr> <th>Source of Funding</th> <th>Dollar Amount</th> </tr> <tr> <td>NSP3</td> <td>\$375,000</td> </tr> <tr> <td>(Other funding source)</td> <td>\$0</td> </tr> <tr> <td>(Other funding source)</td> <td>\$0</td> </tr> </table>	Source of Funding	Dollar Amount	NSP3	\$375,000	(Other funding source)	\$0	(Other funding source)	\$0
Source of Funding	Dollar Amount								
NSP3	\$375,000								
(Other funding source)	\$0								
(Other funding source)	\$0								
Total Budget for Activity	\$375,000								
Performance Measures	It is estimated that approximately 5 units will be acquired for demolition based on the blighted structure criteria established for the program. Previous history with NSP1 has shown that cost estimates for this activity will be approximately \$75,000. All units acquired for demolition will be redeveloped to serve families with incomes that don't exceed 120% of Area Median Income.								
Projected Start Date	4-15-2011								
Projected End Date	4-15-2011								
Responsible Organization	<table border="1"> <tr> <td>Name</td> <td>Pinellas County</td> </tr> <tr> <td>Location</td> <td>600 Cleveland Street, Suite 800, Clearwater, FL 33755</td> </tr> <tr> <td>Administrator Contact Info</td> <td>727-464-8245 sharris@pinellascounty.org</td> </tr> </table>	Name	Pinellas County	Location	600 Cleveland Street, Suite 800, Clearwater, FL 33755	Administrator Contact Info	727-464-8245 sharris@pinellascounty.org		
Name	Pinellas County								
Location	600 Cleveland Street, Suite 800, Clearwater, FL 33755								
Administrator Contact Info	727-464-8245 sharris@pinellascounty.org								

Activity Number 5	
Activity Name	Redevelopment
Use	Select all that apply:
	<input type="checkbox"/> Eligible Use A: Financing Mechanisms
	<input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation

	<input type="checkbox"/> Eligible Use C: Land Banking <input type="checkbox"/> Eligible Use D: Demolition <input checked="" type="checkbox"/> Eligible Use E: Redevelopment	
CDBG Activity or Activities	CDBG - 24 CFR 570.201 (a) Acquisition; 24 CFR 570.202 Eligible rehabilitation and preservation activities; and 24 CFR 570.201 (b) Disposition	
National Objective	Low Moderate Middle Income Housing (LMMH)	
Activity Description	<p>This activity will address neighborhood revitalization with 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.</p> <p>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.</p> <p>Eligible homebuyers for the newly constructed homes 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.</p>	
Location Description	Redevelopment will be completed in the Central and East Lealman neighborhoods that have been identified as the highest priority. These were identified using the HUD mapping tool and are designated as "20". Census tracts with a score of "19" that surround the neighborhood will be considered if the area needs to be expanded for meeting the expenditure deadlines.	
Budget	Source of Funding	Dollar Amount
	NSP3	\$1,000,000
	(Other funding source)	\$
	(Other funding source)	\$
Total Budget for Activity		\$1,000,000
Performance Measures	The primary performance measure will be the number of units acquired and rehabilitated within the neighborhoods. Based on average acquisition and redevelopment costs associated with NSP1, it is estimated that 7 homes will be acquired for redevelopment and resale to families with incomes <120% of Area Median Income.	
Projected Start Date	4/15/2011	
Projected End Date	4/15/2014	
Responsible Organization	Name	Pinellas County
	Location	600 Cleveland Street, Suite 800 Clearwater FL 33755
	Administrator Contact Info	727-464-8245 sharris@pinellascounty.org

Activity Number 6	
Activity Name	Administration
Use	Select all that apply: <input type="checkbox"/> Eligible Use A: Financing Mechanisms

	<input type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/>	Eligible Use C: Land Banking
	<input type="checkbox"/>	Eligible Use D: Demolition
	<input type="checkbox"/>	Eligible Use E: Redevelopment
CDBG Activity or Activities	CDBG - 24 CFR 570.206 Administration of NSP3 Program	
National Objective	Low Moderate Middle Income Housing (LMMH)	
Activity Description	NSP funds will be used to pay reasonable program administration costs related to the planning and execution of the identified activities being proposed for Pinellas County. This includes costs related to staffing for overall program management, coordination, monitoring, reporting, and direct and indirect costs.	
Location Description	Administration of the program will be completed in the Central and East Lealman neighborhoods that have been identified as the highest priority.	
Budget	Source of Funding	Dollar Amount
	NSP3	\$461,751.90
	(Other funding source)	\$
	(Other funding source)	\$
Total Budget for Activity	\$461,751.90	
Performance Measures	The primary performance measure will be to provide staff and resources to administer the activities in the plan within our targeted neighborhoods.	
Projected Start Date	4/15/2011	
Projected End Date	4/15/2014	
Responsible Organization	Name	Pinellas County
	Location	600 Cleveland Street, Suite 800 Clearwater FL 33755
	Administrator Contact Info	727-464-8245 sharris@pinellascounty.org

7. Certifications

Certifications for State and Entitlement Communities

(1) **Affirmatively further fair housing.** The jurisdiction certifies that it 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-displacement and relocation plan.** The applicant certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.

(3) **Anti-lobbying.** The jurisdiction must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.

(4) **Authority of jurisdiction.** The jurisdiction certifies that the consolidated plan or abbreviated plan, as applicable, is authorized under state and local law (as applicable) and that 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.

(5) **Consistency with plan.** The jurisdiction certifies that the housing activities to be undertaken with NSP funds are consistent with its consolidated plan or abbreviated plan, as applicable.

(6) **Acquisition and relocation.** The jurisdiction certifies that it 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.

(7) **Section 3.** The jurisdiction certifies that it 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.

(8) **Citizen participation.** The jurisdiction certifies that it 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.

(9) **Following a plan.** The jurisdiction certifies it is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD. [Only States and entitlement jurisdictions use this certification.]

(10) **Use of funds.** The jurisdiction certifies that it will comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act and Title XII of Division A of the American Recovery and Reinvestment Act of 2009 by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.

(11) **The jurisdiction certifies:**

- a. 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; and

- b. 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:

- a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
- b. 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 nonviolent civil rights demonstrations within its jurisdiction.

(13) **Compliance with anti-discrimination laws.** The jurisdiction certifies that 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 jurisdiction certifies that its 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 certifies that it will comply with applicable laws.

(16) **Vicinity hiring.** The jurisdiction certifies that it will, to the maximum extent feasible, provide for hiring of employees that reside in the vicinity of NSP3 funded projects or contract with small businesses that are owned and operated by persons residing in the vicinity of NSP3 projects.

(17) **Development of affordable rental housing.** The jurisdiction certifies that it will abide by the procedures described in its NSP3 Abbreviated Plan to create preferences for the development of affordable rental housing for properties assisted with NSP3 funds.

Signature/Authorized Official

Date

Title

Appendix: NSP3 Action Plan Contents Checklist

The checklist below is an optional tool for NSP3 grantees to help to ensure that all required elements of the NSP3 Substantial Amendment or the Abbreviated Plan are submitted to HUD. This checklist only includes the minimum required elements that must be included in the NSP3 Action Plan and grantees may want to add additional details. This document must be protected, as described above, in order to use the checkboxes in this checklist.

1. NSP3 Grantee Information

	Yes
Did you include the Program Administrator's name, address, phone, and email address?	<input checked="" type="checkbox"/>

2. Areas of Greatest Need

	Yes
Does the narrative description describe how funds will give priority emphasis to areas of greatest need?	<input checked="" type="checkbox"/>
Does the narrative description specifically address how the funds will give priority emphasis to those areas:	
• With the highest percentage of home foreclosures?	<input checked="" type="checkbox"/>
• With the highest percentage of homes financed by subprime mortgage related loan?; and	<input checked="" type="checkbox"/>
• Identified by the grantee as likely to face a significant rise in the rate of home foreclosures?	<input checked="" type="checkbox"/>
Did you create the area of greatest needs map at http://www.huduser.org/NSP/NSP3.html ?	<input checked="" type="checkbox"/>
Did you include the map as an attachment to your Action Plan?	<input checked="" type="checkbox"/>
<i>ONLY Applicable for States:</i> Did you include the needs of all entitlement communities in the State?	<input type="checkbox"/>

3. Definitions and Descriptions

	Yes
Are the following definitions and topics included in your substantial amendment?:	<input checked="" type="checkbox"/>
• Blighted structure in context of state or local law,	<input checked="" type="checkbox"/>

<ul style="list-style-type: none"> Affordable rents, Ensuring long term affordability for all NSP funded housing projects, Applicable housing rehabilitation standards for NSP funded projects 	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>

4. Low-Income Targeting

	Yes
Did you identify the estimated amount of funds appropriated to provide housing that meets the low-income set aside target?	<input checked="" type="checkbox"/>
Did you provide a summary describing how your jurisdiction will meet its low-income set aside goals?	<input checked="" type="checkbox"/>

5. Acquisition & Relocation

	Yes
For all acquisitions that will result in displacement did you specify:	
<ul style="list-style-type: none"> The planned activity, 	<input type="checkbox"/>
<ul style="list-style-type: none"> The number of units that will result in displacement, 	<input type="checkbox"/>
<ul style="list-style-type: none"> The manner in which the grantee will comply with URA for those residents? 	<input type="checkbox"/>

6. Public Comment

	Yes
Did you provide your draft of the NSP3 substantial amendment for a minimum of 15 days for public comment?	<input checked="" type="checkbox"/>
Did you include the public comments you received on the NSP3 substantial amendment in your plan?	<input type="checkbox"/>

7. NSP Information by Activity

	Check all that apply
Did you include a description of all eligible NSP3 activities you plan to implement with your NSP3 award?	<input checked="" type="checkbox"/>
For each eligible NSP3 activity you plan to implement did you include:	

• Eligible use or uses?	<input type="checkbox"/>
• Correlated eligible CDBG activity or activities?	<input type="checkbox"/>
• Associated national objective?	<input type="checkbox"/>
• How the activity will address local market conditions?	<input type="checkbox"/>
• Range of interest rates (if any)?	<input type="checkbox"/>
• Duration or term of assistance?	<input type="checkbox"/>
• Tenure of beneficiaries (e.g. rental or homeowner)?	<input type="checkbox"/>
• If the activity produces housing, how the design of the activity will ensure continued affordability?	<input type="checkbox"/>
• How you will, to the maximum extent possible, provide for vicinity hiring?	<input type="checkbox"/>
• Procedures used to create affordable rental housing preferences?	<input type="checkbox"/>
• Areas of greatest need addressed by the activity or activities?	<input type="checkbox"/>
• Amount of funds budgeted for the activity?	<input type="checkbox"/>
• Appropriate performance measures for the activity (e.g. units of housing to be acquired, rehabilitated, or demolished for the income levels represented in DRGR) ?	<input type="checkbox"/>
• Expected start and end dates of the activity?	<input type="checkbox"/>
• Name and location of the entity that will carry out the activity?	<input type="checkbox"/>

8. Certifications

	Yes
Did you sign and submit the certification form applicable to your jurisdiction?	<input type="checkbox"/>

9. Additional Documentation

	Yes
Did you include a signed SF-424?	<input type="checkbox"/>

Exhibit A

Proposed Budget

Activity	Amount	<50% Amount	Total	Units
Acquisition-Rehabilitation	\$750,000		\$750,000	5
Acquisition-Rehabilitation-Rental	\$678,387.35	\$1,174,379.75	\$1,852,767.10	25
Acquisition-Demolition	\$375,000		\$375,000	5
Redevelopment	\$1,000,000		\$1,000,000	7
Financing	\$250,000		\$250,000	10
Administration	\$469,751.90		\$469,751.90	
TOTAL	\$3,523,139.25	\$1,174,379.75	\$4,697,519.00	52

Exhibit B

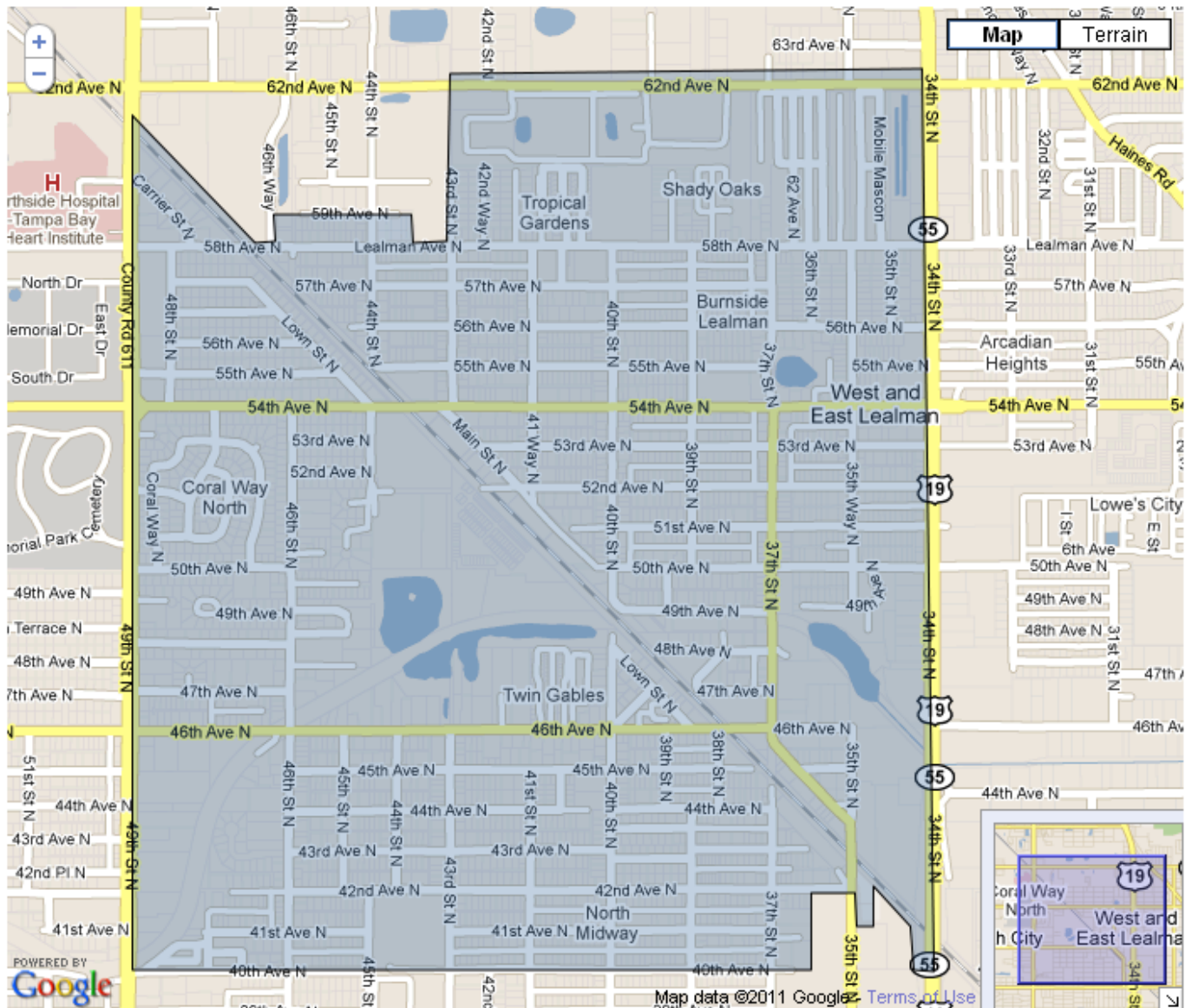
High Priority Areas

Priority Area 1 - Central Lealman

NSP3 Legend (%): — Tract Outline

LOG OUT

[Click here for an Overview](#)



Neighborhood ID: 2743530

NSP3 Planning Data

Grantee ID: 1210300C, 1227240E

Grantee State: FL

Grantee Name: PINELLAS COUNTY, ST PETERSBURG

Grantee Address:

Grantee Email: bgajan@pinellascounty.org

Neighborhood Name: Central Lealman

Date: 2011-01-07 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 20

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 4272

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 83.35

Percent Persons Less than 80% AMI: 63.57

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 4364

Residential Addresses Vacant 90 or more days (USPS, March 2010): 147

Residential Addresses NoStat (USPS, March 2010): 279

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 1258

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 39

Percent of Housing Units 90 or more days delinquent or in foreclosure: 19.5

Number of Foreclosure Starts in past year: 152

Number of Housing Units Real Estate Owned July 2009 to June 2010: 45

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 31

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -32.5

Place (if place over 20,000) or county unemployment rate June 2005: 3.7

Place (if place over 20,000) or county unemployment rate June 2010: 11.3

·Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-82.699971 27.828754 -82.699885 27.808637 -82.679543 27.808561 -82.679801 27.828830

Blocks Comprising Target Neighborhood

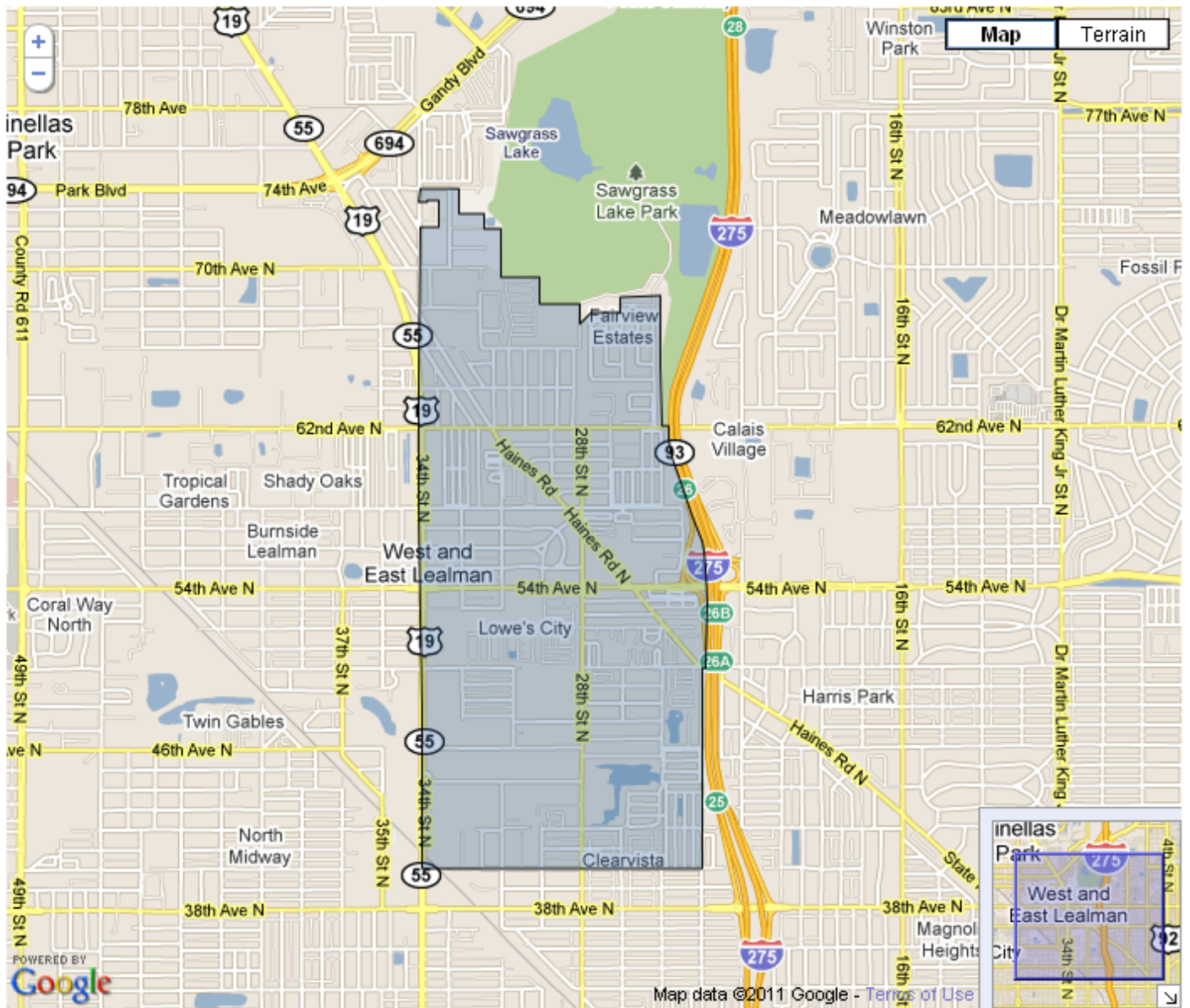
121030247001000, 121030247001001, 121030247001002, 121030247001003, 121030247004020, 121030247004021, 121030247001004, 121030247001007, 121030247001009, 121030247001012, 121030247001029, 121030247001028, 121030247001027, 121030247001026, 121030247001025, 121030247001024, 121030247001023, 121030247001022, 121030247001021, 121030247001032, 121030247001031, 121030247001030, 121030247001020, 121030247001019, 121030247001018, 121030247001017, 121030247001016, 121030247001015, 121030247001014, 121030247001013, 121030247001010, 121030247001008, 121030247001006, 121030247001005, 121030247002000, 121030247002003, 121030247002005, 121030247002007, 121030247002041, 121030247002040, 121030247002039, 121030247002038, 121030247002037, 121030247002036, 121030247002035, 121030247002034, 121030247002033, 121030247002048, 121030247002047, 121030247002046, 121030247002045, 121030247002044, 121030247002043, 121030247002042, 121030247002032, 121030247002031, 121030247002030, 121030247002029, 121030247002028, 121030247002027, 121030247002026, 121030247002016, 121030247002015, 121030247002014, 121030247002013, 121030247002012, 121030247002011, 121030247002010, 121030247002009, 121030247002008, 121030247002025, 121030247002024, 121030247002023, 121030247002022, 121030247002021, 121030247002020, 121030247002019, 121030247002018, 121030247002017, 121030247002006, 121030247002004, 121030247002002, 121030247002001, 121030247003000, 121030247003003, 121030247003005, 121030247003007, 121030247003024, 121030247003023, 121030247003022, 121030247003021, 121030247003020, 121030247003019, 121030247003018, 121030247003017, 121030247003016, 121030247003999, 121030247003031, 121030247003030, 121030247003029, 121030247003028, 121030247003027, 121030247003026, 121030247003025, 121030247003015, 121030247003014, 121030247003013, 121030247003012, 121030247003011, 121030247003010, 121030247003009, 121030247003008, 121030247003006, 121030247003004, 121030247003002, 121030247003001, 121030247004000, 121030247004003, 121030247004005, 121030247004007, 121030247004033, 121030247004032, 121030247004031, 121030247004030, 121030247004029, 121030247004016, 121030247004015, 121030247004014, 121030247004013, 121030247004012, 121030247004011, 121030247004010, 121030247004009, 121030247004008, 121030247004028, 121030247004027, 121030247004026, 121030247004025, 121030247004024, 121030247004023, 121030247004019, 121030247004018, 121030247004017, 121030247004006, 121030247004004, 121030247004002, 121030247004001, 121030247005000, 121030247005003, 121030247005005, 121030247005007, 121030247005016, 121030247005015, 121030247005014, 121030247005013, 121030247005012, 121030247005011, 121030247005010, 121030247005009, 121030247005008, 121030247005031, 121030247005030, 121030247005029, 121030247005028, 121030247005027, 121030247005025, 121030247005024, 121030247005023, 121030247005022, 121030247005021, 121030247005020, 121030247005019, 121030247005018, 121030247005017, 121030247005006, 121030247005004, 121030247005002, 121030247005001, 121030247001011, 121030247004022,

Priority Area 2 - East Lealman

NSP3 Legend (%): — Tract Outline

LOG OUT

[Click here for an Overview](#)



Neighborhood ID: 1051910

NSP3 Planning Data

Grantee ID: 1210300C
Grantee State: FL
Grantee Name: PINELLAS COUNTY
Grantee Address:
Grantee Email: bgajan@pinellascounty.org

Neighborhood Name: East Lealman
Date: 2011-01-07 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 20
State Minimum Threshold NSP3 Score: 17
Total Housing Units in Neighborhood: 4451

Area Benefit Eligibility

Percent Persons Less than 120% AML: 80.08
Percent Persons Less than 80% AML: 60.3

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 4456
Residential Addresses Vacant 90 or more days (USPS, March 2010): 138
Residential Addresses NoStat (USPS, March 2010): 195

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 776

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 38.53

Percent of Housing Units 90 or more days delinquent or in foreclosure: 19.15

Number of Foreclosure Starts in past year: 93

Number of Housing Units Real Estate Owned July 2009 to June 2010: 28

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 19

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -32.5

Place (if place over 20,000) or county unemployment rate June 2005*: 3.7

Place (if place over 20,000) or county unemployment rate June 2010: 11.3

*Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-82.679640 27.839285 -82.677602 27.839285 -82.677623 27.838108 -82.676357 27.838089 -82.676357
27.837501 -82.675627 27.837501 -82.675606 27.835224 -82.673525 27.835186 -82.673503 27.833934
-82.671593 27.833934 -82.671400 27.833934 -82.671443 27.833080 -82.670842 27.833611 -82.669319
27.833649 -82.669362 27.834332 -82.667323 27.834332 -82.667302 27.828298 -82.666959 27.828279
-82.666959 27.827653 -82.666250 27.825604 -82.665113 27.822643 -82.665049 27.820518 -82.665070
27.815982 -82.665070 27.813325 -82.665113 27.808352 -82.679383 27.808352 -82.679361 27.815868
-82.679425 27.828431

Blocks Comprising Target Neighborhood

121030246011034, 121030246011038, 121030246011084, 121030246011055, 121030246011054,
121030246011053, 121030246011052, 121030246011051, 121030246011050, 121030246011049,
121030246011048, 121030246011047, 121030246011064, 121030246011063, 121030246011062,
121030246011059, 121030246011058, 121030246011057, 121030246011056, 121030246011083,
121030246011082, 121030246011081, 121030246011080, 121030246011078, 121030246011076,
121030246011075, 121030246011074, 121030246011073, 121030246011072, 121030246011071,
121030246011070, 121030246011069, 121030246011068, 121030246011067, 121030246011066,
121030246011065, 121030246011044, 121030246011045, 121030246011039, 121030246012000,
121030246012003, 121030246012005, 121030246012007, 121030246012017, 121030246012016,
121030246012015, 121030246012014, 121030246012013, 121030246012012, 121030246012011,
121030246012010, 121030246012009, 121030246012008, 121030246012006, 121030246012004,
121030246012002, 121030246012001, 121030246023000, 121030246023003, 121030246023005,
121030246023007, 121030246023039, 121030246023038, 121030246023037, 121030246023036,
121030246023035, 121030246023016, 121030246023015, 121030246023014, 121030246023013,
121030246023012, 121030246023011, 121030246023010, 121030246023009, 121030246023008,
121030246023025, 121030246023024, 121030246023023, 121030246023022, 121030246023021,
121030246023020, 121030246023019, 121030246023018, 121030246023017, 121030246023034,
121030246023033, 121030246023032, 121030246023031, 121030246023030, 121030246023029,
121030246023028, 121030246023027, 121030246023026, 121030246023006, 121030246023004,
121030246023002, 121030246023001, 121030246024000, 121030246024003, 121030246024005,
121030246024007, 121030246024024, 121030246024023, 121030246024022, 121030246024021,
121030246024020, 121030246024019, 121030246024018, 121030246024017, 121030246024016,
121030246024031, 121030246024030, 121030246024029, 121030246024028, 121030246024027,
121030246024026, 121030246024025, 121030246024015, 121030246024014, 121030246024013,
121030246024012, 121030246024011, 121030246024010, 121030246024009, 121030246024008,
121030246024006, 121030246024004, 121030246024002, 121030246024001, 121030246025001,
121030246025004, 121030246025006, 121030246025008, 121030246025043, 121030246025042,
121030246025041, 121030246025040, 121030246025039, 121030246025038, 121030246025037,
121030246025036, 121030246025035, 121030246025999, 121030246025048, 121030246025047,
121030246025046, 121030246025045, 121030246025044, 121030246025034, 121030246025033,
121030246025032, 121030246025031, 121030246025030, 121030246025029, 121030246025028,
121030246025017, 121030246025016, 121030246025015, 121030246025014, 121030246025013,
121030246025012, 121030246025011, 121030246025010, 121030246025009, 121030246025026,
121030246025025, 121030246025024, 121030246025023, 121030246025022, 121030246025021,
121030246025020, 121030246025019, 121030246025018, 121030246025007, 121030246025005,
121030246025003, 121030246025002, 121030246011077, 121030246011037, 121030246011033,

Exhibit C

Summary of Public Comments

Given the high unemployment rate and low wages found in Pinellas County's service economy, we encourage you to aim to exceed the NSP3 requirement that 25% of the NSP3 funds be used to provide rental opportunities for the LI/ELI groups.

The plan allows flexibility for exceeding the 25% requirements and since Pinellas County has placed priority on rental housing, the goal is to exceed the requirements. However, exceeding the goal can only be achieved if we are able to acquire the units before private investors purchase them.

We point out that under NSP1 several jurisdictions nationwide committed to affordability periods which exceeded the HOME minimums, and we urge Pinellas County to do the same. We hope that you will continue to place properties acquired with NSP III monies into the CLT and keep them affordable in perpetuity. If the properties will indeed be placed in the CLT, we suggest that you specifically indicate in the plan.

The goal for Pinellas County is to utilize the Community Land Trust and the plan identifies only the minimum requirements to allow flexibility. Utilizing the Land Trust requires that lenders are willing to provide first mortgages with the Land Trust restrictions and we continue to work with lenders to educate them on the importance of long term affordability.

We note that your proposed plan will use a portion of the NSP3 funds for demolition and reconstruction. While you have met the plan requirements in identifying the number of low/moderate income units expected to be demolished, and the number expected to be produced; you have not provided for any of the replacement units will be made affordable to the 50% and under AMI group nor why, based on market conditions, you are choosing demolition versus preservation of the units. The NSP3 regulations require an explanation of why demolition over preservation is being conducted pursuant to market conditions.

The demolition funding is in the plan to allow flexibility in the instances where rehabilitation costs exceed 50% of the market value. The preference is rehabilitation; however, based on the age of the housing stock we may find properties that are not financially feasible to rehabilitate. Including the demolition line item allows the activity to proceed without the need to resubmit an amendment to HUD.

We note that you intend to acquire existing multi-family units in the target area that are all ready occupied. We encourage you to prioritize taking steps to prevent the trauma of eviction of the current tenants/occupants, thereby reducing the costs associated with providing shelter for displaced families and minimizing the "musical chairs" impact of a revolving door of residents.

The preference is not to cause displacement or relocation. If eligible properties are occupied, temporary relocation is the preference; however, if the current residents don't meet the eligibility requirement or the property has tenants that are not in compliance with their lease, the nonprofit or for-profit developer needs to be able to address those issues.

It is our view that your plan needs to provide more detail in its explanation of how it intends to comply with both the Dodd-Frank Act and Section 3 of the HAD Act in providing “for the hiring of employees who reside in the vicinity. . . of projects funded under this section or contract with small businesses that are owned and operated by persons residing in the vicinity of such projects.” How do you plan to satisfy the hiring and contracting requirements of Dodd Frank and Section 3; and ensure that your contractors and subcontractors do as well? How will you accomplish outreach? Can you estimate the number of jobs anticipated? Can you estimate the number of jobs you intend to set aside for Section 3 businesses? What partnerships will you form to ensure local hiring and contracting? Section 3 noncompliance can result in sanctions that limit recipients future abilities to participate in HUD programs; therefore, as a precaution, we would like to see (reference Certification No. 16 on page 12) more detail in the portion of your plan which deals with Dodd-Frank and Section 3 compliance.

Although it is difficult to estimate the number of jobs anticipated until rehabilitation needs have been identified, our outreach to contractors within the neighborhoods will be conducted through identification with SIC codes. These codes will assist in determining the types of work that businesses have and the level of expertise with specialized trades.

We commend you for placing your plan online for public comment and we understand the scarcity of resources all local governments are facing at this time; however, in the future we ask that you consider making the plan available in additional languages and holding public meetings in affected neighborhoods.

Recovery fund rules and regulations often come with very restrictive deadlines making it difficult to schedule neighborhood outreach while still meeting submission deadlines. Upon request, documents we will make documents available in additional languages.

Exhibit D

Section 3 and Vicinity Hiring Preference

Pinellas County will identify and solicit contractors for participation in the Neighborhood Stabilization Program. Identification of potential contractors will be completed through the Request for Qualification process. Additional outreach methods, such as identifying contractors through local advertising and/or direct mailing to identify contractors that reside in our two priority neighborhoods will be completed. Preference will be given to vicinity contractors to the extent that they are comparable bids.

The contracts established with contractors will include language that includes preference for utilizing vicinity contractors when soliciting sub-contractors or hiring new employees.

7. Certifications

Certifications for State and Entitlement Communities

- (1) **Affirmatively further fair housing.** The jurisdiction certifies that it 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-displacement and relocation plan.** The applicant certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.
- (3) **Anti-lobbying.** The jurisdiction must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (4) **Authority of jurisdiction.** The jurisdiction certifies that the consolidated plan or abbreviated plan, as applicable, is authorized under state and local law (as applicable) and that 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.
- (5) **Consistency with plan.** The jurisdiction certifies that the housing activities to be undertaken with NSP funds are consistent with its consolidated plan or abbreviated plan, as applicable.
- (6) **Acquisition and relocation.** The jurisdiction certifies that it 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.
- (7) **Section 3.** The jurisdiction certifies that it 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.
- (8) **Citizen participation.** The jurisdiction certifies that it 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.
- (9) **Following a plan.** The jurisdiction certifies it is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD. [Only States and entitlement jurisdictions use this certification.]
- (10) **Use of funds.** The jurisdiction certifies that it will comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act and Title XII of Division A of the American Recovery and Reinvestment Act of 2009 by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.
- (11) **The jurisdiction certifies:**
 - a. 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; and

- b. 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:

- a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
- b. 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 nonviolent civil rights demonstrations within its jurisdiction.

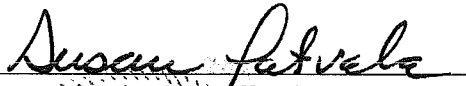
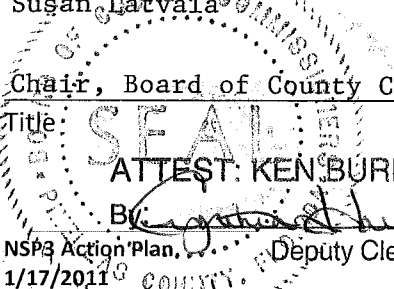

(13) **Compliance with anti-discrimination laws.** The jurisdiction certifies that the NSP grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

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

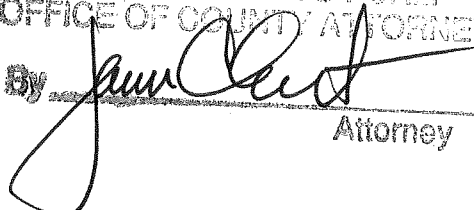
(15) **Compliance with laws.** The jurisdiction certifies that it will comply with applicable laws.

(16) **Vicinity hiring.** The jurisdiction certifies that it will, to the maximum extent feasible, provide for hiring of employees that reside in the vicinity of NSP3 funded projects or contract with small businesses that are owned and operated by persons residing in the vicinity of NSP3 projects.

(17) **Development of affordable rental housing.** The jurisdiction certifies that it will abide by the procedures described in its NSP3 Abbreviated Plan to create preferences for the development of affordable rental housing for properties assisted with NSP3 funds.


Signature/Authorized Official
Susan Latvala
Chair, Board of County Commissioners
Title: 
ATTEST: KEN BURKE, CLERK
By: 
NSP3 Action Plan, 1/17/2011 Deputy Clerk

2/22/11
Date

APPROVED AS TO FORM
OFFICE OF COUNTY ATTORNEY
By: 
Attorney