



NEIGHBORHOOD STABILIZATION
PROGRAM
SUBSTANTIAL AMENDMENT

TO THE
LAKE COUNTY
2008-2009 ANNUAL ACTION PLAN

Lake County Board of County Commissioners
Community Services Department
Housing and Community Development Division

December 1, 2008

TABLE OF CONTENTS

APPLICATION FOR FEDERAL ASSISTANCE (SF-424 FORMS)

A. AREAS OF GREATEST NEED

PERCENTAGE OF FORECLOSURES

SUBPRIME (HIGH COST LOANS)

AREAS AT RISK

B. DISTRIBUTION AND USES OF FUNDS

C. DEFINITIONS AND DESCRIPTIONS

(1) "BLIGHTED STRUCTURE"

(2) "AFFORDABLE RENTS"

(3) "CONTINUED AFFORDABILITY"

(4) "HOUSING REHABILITATIONS STANDARDS"

D. LOW INCOME TARGETING

E. ACQUISITIONS & RELOCATION

F. PUBLIC COMMENT

G. NSP INFORMATION BY ACTIVITY

ACTIVITY 1 – ESTABLISH FINANCING MECHANISMS

ACTIVITY 2 – DEMOLISH BLIGHTED STRUCTURES

ACTIVITY 3 - PROGRAM ADMINISTRATION

EXHIBIT A NSP BUDGET

CERTIFICATIONS

NSP SUBSTANTIAL AMENDMENT CHECKLIST

**APPLICATION FOR
FEDERAL ASSISTANCE**

OMB Approved No. 3076-0006

Version 7/03

1. TYPE OF SUBMISSION: Application <input checked="" type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		<input type="checkbox"/> Pre-application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction	2. DATE SUBMITTED December 1, 2008	Applicant Identifier
			3. DATE RECEIVED BY STATE	State Application Identifier
			4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier
5. APPLICANT INFORMATION				
Legal Name: Lake County Board of County Commissioners		Organizational Unit: Department: Community Services		
Organizational DUNS:		Division: Housing & Community Development		
Address: Street: 315 W. Main St.; PO Box 7800		Name and telephone number of person to be contacted on matters involving this application (give area code)		
City: Tavares		Prefix: Mr.	First Name: William	
County: Lake		Middle Name Adam		
State: Florida		Last Name Gearing		
Zip Code 32778	Suffix:			
Country: United States of America		Email: wgearing@lakecountyfl.gov		
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 59-000695		Phone Number (give area code) 352-742-6515	Fax Number (give area code) 352-742-6535	
8. TYPE OF APPLICATION: <input 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.) Other (specify) <input type="checkbox"/> <input type="checkbox"/>		7. TYPE OF APPLICANT: (See back of form for Application Types) Other (specify)		
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: TITLE (Name of Program): <input type="checkbox"/> - <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		9. NAME OF FEDERAL AGENCY:		
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): Lake County, Florida		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Neighborhood Stabilization Program		
13. PROPOSED PROJECT Start Date: Ending Date:		14. CONGRESSIONAL DISTRICTS OF: a. Applicant b. Project		
15. ESTIMATED FUNDING:		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?		
a. Federal	\$ 3,136,967.00	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 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	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.		
g. TOTAL	\$.00	a. Authorized Representative		
Prefix Mr.		First Name Welton	Middle Name G.	
Last Name Cadwell		Suffix		
b. Title Chairman, Lake County Board of County Commissioners		c. Telephone Number (give area code) 352-343-9850		
d. Signature of Authorized Representative		e. Date Signed		

Previous Edition Usable
Authorized for Local Reproduction

Standard Form 424 (Rev.9-2003)
Prescribed by OMB Circular A-102

THE NSP SUBSTANTIAL AMENDMENT

Jurisdiction(s): Lake County, Florida	NSP Contact Person: Bill Gearing, CPM, Community Enhancement Coordinator
Jurisdiction Web Address: www.lakecountyfl.gov	Housing and Community Development Division Lake County Community Services Department 1300 S. Duncan Dr., Bldg. E, Room 112 PO Box 7800 Tavares, Florida 32778-7800 Phone: 352-742-6515 Fax: 352-742-6535 Email: WGearing@lakecountyfl.gov

A. AREAS OF GREATEST NEED

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

Note: An NSP substantial amendment must include the needs of the entire jurisdiction(s) covered by the program; states must include the needs of communities receiving their own NSP allocation. To include the needs of an entitlement community, the State may either incorporate an entitlement jurisdiction's consolidated plan and NSP needs by reference and hyperlink on the Internet, or state the needs for that jurisdiction in the State's own plan. The lead entity for a joint program may likewise incorporate the consolidated plan and needs of other participating entitlement jurisdictions' consolidated plans by reference and hyperlink or state the needs for each jurisdiction in the lead entity's own plan.

HUD has developed a foreclosure and abandonment risk score to assist grantees in targeting the areas of greatest need within their jurisdictions. Grantees may wish to consult [this data](#), in developing this section of the Substantial Amendment.

Response:

In Lake County we carefully selected our target areas and therefore where NSP funding will be distributed in accordance the Housing and Economic Recovery Act (HERA) need factors identifying the areas of greatest need by determining the greatest percentage of homes in foreclosure, areas with the highest percentage of homes financed by a subprime mortgage and areas where there is likely to face a significant rise in the rate of home foreclosures.

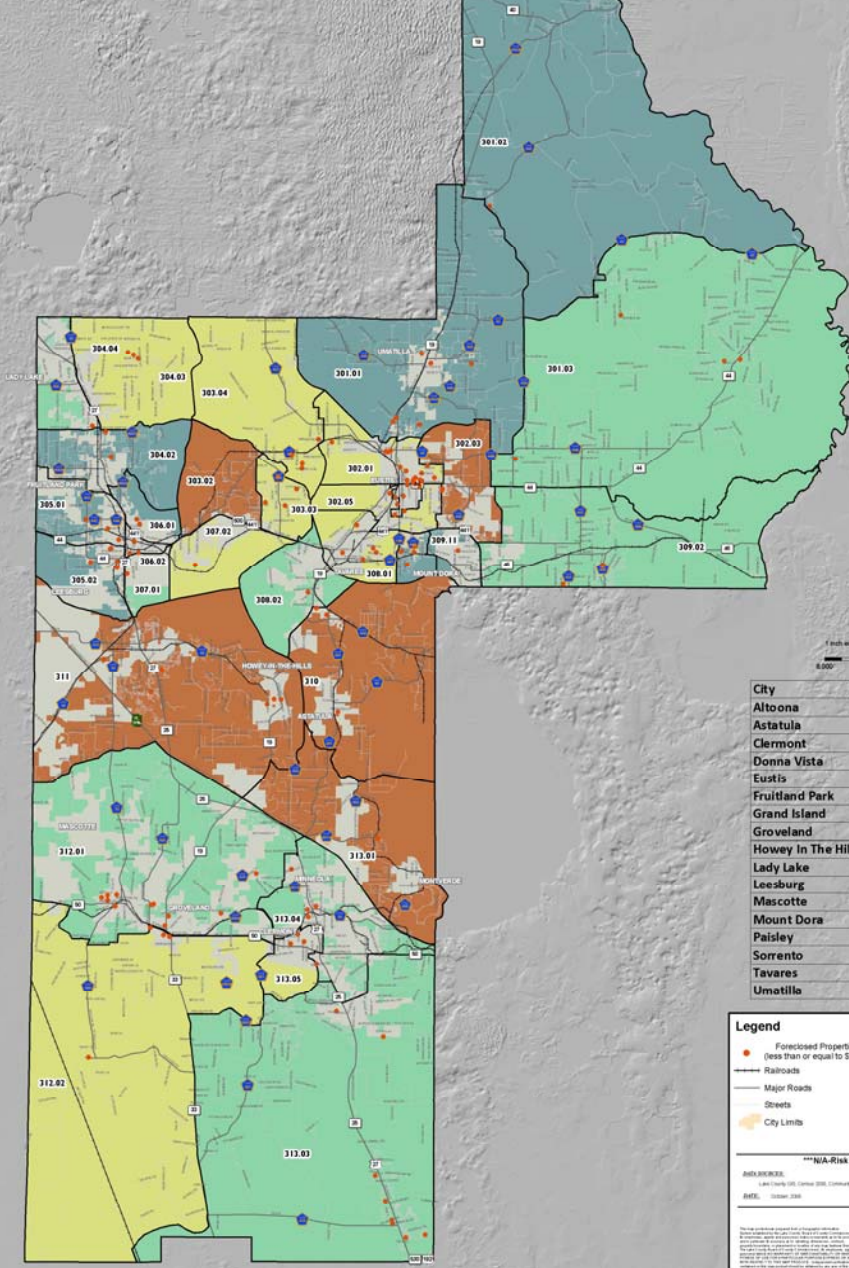
Our primary source of data was provided by HUD from their Foreclosure and Abandonment Risk Score Analysis published on HUD's website. Also, information was gathered from local provider groups including the Lake-Sumter, FL Habitat for Humanity; national data resources such as RealtyTrac.com and MortgageBankers.com; and information available from the Lake County Department of Community Services.

As of October 31 the number of foreclosed properties in Lake County is in excess of 3,100. The majority of these foreclosed properties are located within the city limits of both Lake County's CDBG entitlement partner communities and non-partner small Cities through-out the County. Very few areas which could be considered the greatest need areas are actually in the County's non-incorporated land area. Therefore, Lake County has determined that the entire County will be identified as our service area and the target areas have been selected based on areas of greatest need and not restricted by geographic local government boundaries. Those communities which are currently Lake County CDBG Entitlement partners include Astatula, Lady Lake, Montverde, and Tavares. For those communities which are not currently entitlement partners with Lake County, a Memorandum of Understanding (MOU) will be established to grant authority to operate the NSP within their jurisdictional boundaries. These additional communities which will be included in the Lake County NSP include Altoona, Clermont, Dona Viste, Eustis, Fruitland Park, Grand Island, Groveland, Howey in the Hills, Leesburg, Mascotte, Mount Dora, Paisley, Sorrento, and Umatilla.

Areas of Greatest Needs

Please refer to the attached Map below as a graphic description of the Areas of Greatest Needs utilizing HUD's Foreclosure and Abandonment Risk Scoring System. We have displayed only those areas of the County with a Risk Score of 8, 9 and 10. Risk Scores are displayed as follows: 8 is Green, 9 is Yellow, and 10 is Blue. Therefore, only those areas displayed in Red are excluded from our first priority (Greatest Need Areas) for program expenditures as a result of their individual Risk Score being 7 or less.

**Community Services of Lake County
Foreclosures w/ Census Tract & Risk Scores**



1 inch equals 8,000 feet
0 8,000 Feet

City	# of Properties
Altoona	1
Astatula	1
Clermont	21
Donna Vista	1
Eustis	28
Fruitland Park	2
Grand Island	2
Groveland	11
Howey In The Hills	3
Lady Lake	5
Leesburg	28
Mascotte	7
Mount Dora	7
Paisley	1
Sorrento	2
Tavares	11
Umatilla	7

Legend

- Foreclosed Properties (less than or equal to \$120,000)
- Railroads
- Major Roads
- Streets
- City Limits

US Census Tract 2000 Risk Score

307.01
N/A
8
9
10

***N/A-Risk Score not provided

DISCLAIMER:
Lake County, FL, Census 2000, Community Services
DATE: October 2008
Produced by Lake County GIS

Top Priority Property Targets

Please refer to the attached Chart below which indicates the Top 138 properties which we have initially identified as targets for NSP funding. The foreclosed properties have been individually selected because they are currently valued at \$120,000 or less. With the mandated acquisition price discounts of 5-15% per property we believe any of these properties can be acquired, rehabilitated and re-sold or rented and remain within the affordable range of our proposed clients. This is a preliminary survey to help determine the areas of greatest need and the availability of affordable, foreclosed properties. This list and map will be revised at the time of amendment approval so that the most recent data can be used. All properties to be considered will be affordable and discounted in price, as well as foreclosed or abandoned as required. As much as is practical, the focus of the program will be those areas with greatest concentrations of affordable foreclosed properties and pending foreclosures within these areas of highest risk. This will be affected by the eligible applicants received and the areas in which they need to live to maintain affordable living (proximity to work, schools, etc).

It is the County's intention to allow for Affordable Housing providers to address units within Lake County municipalities that are areas of greatest need and are also not partners in the Lake County entitlement by means of an MOU (memorandum of understanding) where Lake County will be the lead entity with all administrative responsibilities and all NSP goals and requirements will be accepted by any such non-entitlement partners wishing to participate. The County will use an existing list of SHIP preferred lenders, real estate professionals and vendors to access and develop a pool of affordable foreclosed and abandoned properties. Through financing mechanisms, the County will assist Affordable Housing Partners to acquire, rehabilitate (or redevelop) properties for sale to LMMI HH.

Top Priority Property Targets

(Available > \$120,000)

City	# of Properties
Altoona	1
Astatula	1
Clermont	21
Donna Vista	1
Eustis	28
Fruitland Park	2
Grand Island	2
Groveland	11
Howey In The Hills	3
Lady Lake	5
Leesburg	28
Mascotte	7
Mount Dora	7
Paisley	1
Sorrento	2
Tavares	11
Umatilla	7

B. DISTRIBUTION AND USES OF FUNDS

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

Response:

The use of NSP funding will be restricted to the areas of greatest needs as exemplified by local and national data which indicate the following:

- Foreclosure and Abandonment Risk Scores: 8, 9 & 10
- High foreclose rates: Ranging from 5.9% to 8.7%
- High cost loan rates: Ranging from 29.3% to 37.4%

All of these areas are forecasted to be highly affected by additional foreclosures over the next 18 month period and are therefore identified as our specific areas of greatest need. The areas identified address all three (3) stipulated need categories of the NSP program.

The table below describes the types of activities that will be carried out with NSP funds and how they are allocated by Eligible Use category.

Eligible Use	Housing Units Served	Cost
A. Financing Mechanisms	28	\$ 2,805,000.00
D. Demolition	15	\$ 22,500.00
Program Administration	43	\$ 309,467.00

C. DEFINITIONS AND DESCRIPTIONS

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

Response:

A blighted structure is one which exhibits objectively determinable signs of deterioration sufficient to constitute a threat to human health, safety, and/or public welfare. Furthermore, any structure unfit for use, habitation, or dangerous to persons or other property would meet our local definition in Lake County.

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

Response:

Affordable rents are those, with respect to various income categories, which will not exceed 30% of the maximum gross monthly income of a household at the maximum allowable income of any particular income category.

The maximum Affordable Rents shall not exceed the Fair Market Rents (FMR) as published annually by the U. S. Department of Housing and Urban Development for the Orlando-Kissimmee Metropolitan Statistical Area (MSA). The current rates are listed below:

	Eff.	1 Bed	2 Bed	3 Bed	4 Bed
FMR	\$ 793	\$ 862	\$ 985	\$ 1,233	\$ 1,452

Source: U. S. Department of Housing and Urban Development, 2009

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

Response:

Lake County will ensure the long term affordability through the use of recorded Restrictive Use Covenants (for sale units) and subgrant agreements with Partners requiring long term affordability on any rental units. Affordability provisions will remain in place for 20 years for units sold to persons at or above 80% AMI. Affordability provisions will remain in place for 30 years for persons with incomes below 80% of AMI. Additionally, all subsequent purchasers of assisted units must be income eligible or, if any subsequent purchasers of the unit are not-income eligible, the amount of assistance will be recaptured at resale. Recapture provisions will be identical to those established in our SHIP Program, Local Housing Assistance Plan.

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

Response:

The HOME Housing Rehabilitation Standards will be used in the NSP program in Lake County.

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: \$1,112,500 (which represents 35% of total grant).

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 (AMI).

Response:

Lake County estimates that 35% of our NSP grant funds will be utilized on persons at or below 50% AMI. This will be achieved through agreements with our Affordable Housing Partners utilizing ELIGIBLE USE A: Financing Mechanisms. Our partners will acquire and rehabilitate both for sale units (8) and rental units (3) restricted to persons whose incomes do not exceed 50 percent of AMI. Therefore, we will create 11 housing units for this income group. For SSO's and Habitat affiliates with the capacity to address NSP goals and requirements, Lake County intends to make funds available using HUD Q& A criteria for *Financing Mechanisms* using forgivable loans:

HUD NSP Q&A: ‘A grantee wishes to make a loan (the “NSP Loan”) to a non-profit entity (the “Developer”) to finance the purchase of foreclosed upon homes and residential properties for rehabilitation (or redevelopment) and resale to low- and moderate-income homebuyers. Upon completion of the rehabilitation (or redevelopment), the Developer will sell each property to an NSP income eligible homebuyer and take back a “purchase money mortgage” (i.e., a promissory note secured by a lien on the property). The payments received by the Developer on the purchase money mortgages will be used by it in accordance with NSP requirements to finance the purchase and rehabilitation (or redevelopment) of additional foreclosed upon properties for subsequent resale to NSP income eligible homebuyers. The Developer will take back a purchase money mortgage on each sale. The terms of the NSP Loan may provide for no interest and no principal amortization until the maturity date, and may contain such other terms as may be negotiated between the Developer and the grantee, subject to compliance with applicable NSP requirements. The NSP Loan terms may also provide for forgiveness of the Developer’s repayment obligations, in whole or in part, upon completion of the approved activities, as specified in the NSP Loan agreement, in accordance with NSP requirements.

The NSP Notice provides that revenue received by a private individual or other entity that is directly generated by an activity carried out pursuant to Section 2301(c)(3)(A) must be provided to the grantee. However, since the grantee could immediately use that revenue to make another loan to the Developer for a similar activity, the loan agreement between the grantee and Developer can provide for continued use as described above, subject to compliance with all applicable NSP requirements. Grantees are reminded that Section 2301(d)(3) provides that, if an abandoned or foreclosed-upon home or residential property is purchased, redeveloped, or otherwise sold to an individual as a primary

residence, then such sale shall be in an amount equal to or less than the cost to acquire and redevelop or rehabilitate such home or property up to a decent, safe, and habitable condition. Revenue generated by activities carried out pursuant to Section 2301(c)(3)(A) does not have to be returned to the grantee after five years.’

If all funds cannot be obligated using Loans to SSO’s and Habitat affiliates, Lake County will provide cash assistance through first (maximum 1% interest) and soft second loans (based on affordability and need for each HH) to our Partners to directly to eligible home buyers to implement this strategy in the 18 months time frame.

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.

Response:

Lake County intends to utilize ELIGIBLE USE A: Financing Mechanisms and D: Demolish Blighted Structures through local Affordable Housing Partners. Lake County will not directly acquire any properties nor will we be entertaining any demolition activities directly. We will not entertain any occupied structures and therefore there will not be an relocations.

<i>Activity</i>	<i>Low Income</i>	<i>Moderate Income</i>	<i>Middle Income</i>	<i>Total</i>
ELIGIBLE USE A: Financing Mechanisms	11	11	6	28
ELIGIBLE USE D: Demolish Blighted Structures	5	10	0	15

For SSO’s and Habitat affiliates with the capacity to address NSP goals and requirements, Lake County intends to make funds available using HUD Q& A criteria for *Financing Mechanisms* using forgivable loans:

HUD NSP Q&A: ‘A grantee wishes to make a loan (the “NSP Loan”) to a non-profit entity (the “Developer”) to finance the purchase of foreclosed upon homes and residential properties for rehabilitation (or redevelopment) and resale to low- and moderate-income homebuyers. Upon completion of the rehabilitation (or redevelopment), the Developer will sell each property to an NSP income eligible homebuyer and take back a “purchase money mortgage” (i.e., a promissory note secured by a lien on the property). The payments received by the Developer on the purchase money mortgages will be used by it in accordance with NSP requirements to finance the purchase and rehabilitation (or redevelopment) of additional foreclosed upon properties for subsequent resale to NSP income eligible homebuyers. The Developer will take back a purchase money mortgage on each sale. The terms of the NSP Loan may provide for no interest and no principal amortization until the maturity date, and may contain such other terms as may be negotiated between the Developer and the grantee, subject to compliance with applicable NSP requirements. The NSP Loan terms may also provide for forgiveness of the Developer’s repayment obligations, in whole or in part, upon completion of the approved activities, as specified in the NSP Loan agreement, in accordance with NSP requirements.

The NSP Notice provides that revenue received by a private individual or other entity that is directly generated by an activity carried out pursuant to Section 2301(c)(3)(A) must be provided to the grantee. However, since the grantee could immediately use that revenue to make another loan to the Developer for a similar activity, the loan agreement between the grantee and Developer can provide for continued use as described above, subject to compliance with all applicable NSP requirements. Grantees are reminded that Section 2301(d)(3) provides that, if an abandoned or foreclosed-upon home or residential property is purchased, redeveloped, or otherwise sold to an individual as a primary residence, then such sale shall be in an amount equal to or less than the cost to acquire and redevelop or rehabilitate such home or property up to a decent, safe, and habitable condition. Revenue generated by activities carried out pursuant to Section 2301(c)(3)(A) does not have to be returned to the grantee after five years.’

If all funds cannot be obligated using Loans to SSO’s and Habitat affiliates, Lake County will provide cash assistance through first (maximum 1% interest) and soft second loans (based on affordability and need for each HH) to our Partners to directly to eligible home buyers to implement this strategy in the 18 months time frame.

F. PUBLIC COMMENT

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

Note: proposed NSP Substantial Amendment must be published via the usual methods and posted on the jurisdiction’s website for no less than 15 calendar days for public comment.

Response:

The plan was posted on Lake County's website, www.lakecountyfl.gov for public review and comment for 15 days which began on November 10, 2008. The document will remain on our website up to and after the meeting of the Board of County Commissioners on November 25, 2008. The document's location for review and comment was advertised in the Lake County Edition of the Orlando Sentinel on November 9, 2008. The advertisement posted in the Orlando Sentinel is provided below on Page 15.

A summary of the comments received during the public review and comment period and our responses and any action steps taken as a result are provided below.

Comment # 1:

A number of local vendors have reached out advising us of their availability to provide services during the implementation of the program.

Action Step: A list of all interested parties will be maintained and referred to our local partners who will be contracted to perform the implementation.

Comment # 2:

Our CDBG Entitlement Partner, the City of Lady Lake wrote advising us of a major effort on their part to foreclose on and demolish 15 mobile home structures in the Skyline Hills area (which is a CDBG target neighborhood). They are requesting the inclusion of this effort in the NSP program and would like \$22,500.00 appropriated to cover the cost.

Action Step: Lake County agreed to include this outstanding project in the NSP and therefore has amended their NSP Application adding the Eligible Use Category D. Demolish Blighted Structures to the Plan and allocated the full amount in our budget.

Comment # 3:

Habitat for Humanity Lake-Sumter, FL Inc. wrote asking a series of questions to clarify their understanding of the Plan as drafted. Also, they had one substantive comment pertaining to increasing the number of housing units for very low income to purchase and reduce the number of rentals. They are strongly supportive of the Plan and intend to apply to be one of our Local Development Partners during the implementation stage.

Action Step: We responded in writing specifically to each of the four (4) questions posed to assist them in a better understanding of the program. On the substantive question of a realignment of purchase vs. rental for the very low income, we have decided to amend

our Plan to achieve just that outcome. We are increasing the numbers of units for purchase and reduced the number of units for rental.

**LAKE COUNTY
NEIGHBORHOOD STABILIZATION PROGRAM
PUBLIC INSPECTION AND COMMENT PERIOD**

The Lake County Department of Community Services has completed a plan outlining proposed uses of Lake County's Neighborhood Stabilization Program allocation. Total anticipated allocation is \$3,136,967. The Plan will still require approval by the Lake County Board of County Commissioners and the U.S. Department of Housing and Urban Development (HUD) before it can be implemented. All proposed activities will benefit low, moderate, and middle income persons as defined in Title III of Division B of the Housing and Economic Recovery Act, 2008.

The Plan will be **available for public inspection and comment between November 10 and November 25, 2008** on the County's website at www.lakegovernment.com.

Any questions regarding this Plan should be directed to Bill Gearing at 352-742-6515 or by email at wgearing@lakecountyfl.gov. All comments received will be considered.

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

Activity # 1: Establish Financing Mechanisms

(1) Activity Name: Financing Mechanisms with Affordable Housing Partners

(2) Activity Type: ELIGIBLE USE A: Establish Financing Mechanisms and CDBG 24CFR 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., \leq 120% of area median income).

Lake County's project will directly benefit Low, Moderate, and Middle Income Persons as defined in the NSP Federal Register, published October 6, 2008. We anticipate that a total of 28 income eligible households will be served.

(4) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

Lake County intends to work through our Affordable Housing Partners which may include Lake-Sumter FL Habitat for Humanity, New Beginnings, Homes in Partnership, City Governments, and other Supportive Services Organizations (SSO's) (with the capacity to provide affordable housing and meet NSP goals and requirements) which will be selected by a competitive process to implement the NSP program by utilizing ELIGIBLE USE A: Financing Mechanisms. It is our intention to make loans and grants to local Affordable Housing Partners to create 28 households by providing financing for them to acquire, rehab, and sell to income eligible Home Buyers and to provide permanent rental housing opportunities for a portion of our homeless population in Community Residences (small group homes with Supportive Services provided). Please refer to the chart under item # 6 for the breakdown by income levels. Those units provided for persons with incomes below 50% of AMI represents 35% of our grant funding.

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

As of October 31 the number of foreclosed properties in Lake County is in excess of 3,100. The majority of these foreclosed properties are located within the city limits of both Lake County's CDBG entitlement partner communities and non-partner small Cities through-out the County. Very few areas which could be considered the greatest need areas are actually in the County's non-incorporated land area. Therefore, Lake County

has determined that our service area and the target areas have been selected based on areas of greatest need and not restricted by geographic local government boundaries. Those communities which are currently Lake County CDBG Entitlement partners include Astatula, Lady Lake, Montverde, and Tavares. For those communities which are not currently entitlement partners with Lake County, a Memorandum of Understanding (MOU) will be established to grant authority to operate the NSP within their jurisdictional boundaries. These additional communities which will be included in the Lake County NSP include Altoona, Clermont, Dona Vista, Eustis, Fruitland Park, Grand Island, Groveland, Howey in the Hills, Leesburg, Mascotte, Mount Dora, Paisley, Sorrento, and Umatilla. **Specifically the service area will include: the Eustis area (Zip Codes 32726 & 32736); the Clermont area (Zip Code 34711); the Leesburg area (Zip Codes 34748 & 34788) and the City of Lady Lake (Zip Code 32159).**

(6) Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

<i>Activity</i>	<i>Low Income</i>	<i>Moderate Income</i>	<i>Middle Income</i>	<i>Total</i>
ELIGIBLE USE A: Financing Mechanisms	11	11	6	28

Lake County will not acquire, rehab or demolish any housing units directly. All activities and therefore NSP funding will be provided through ELIGIBLE USE A: Financing Mechanisms by working with a select number of local Affordable Housing Partners.

We anticipate the breakdown of the housing units which will be provided are as follows:

<i>Activity</i>	<i>Income Level</i>	<i># of Units</i>	<i>Average Cost</i>	<i>Total Cost</i>
Purchase assistance-single family	Low	8	\$110,000	\$ 880,000
Purchase assistance-single family	Moderate	11	\$100,000	\$1,100,000
Purchase assistance-single family	Middle	6	\$100,000	\$ 600,000
Purchase assistance-Community residence with supportive services	Low	3	\$ 75,000	\$ 225,000

(7) Total Budget: \$2,805,000

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

Lake County's Community Services Department (c/o Bill Gearing, 1300 S. Duncan Drive, Tavares, FL, 32778-7800, phone: 352-742-6515) will conduct a competitive process to select local Affordable Housing Partners. Organizations such as the Lake-Sumter FL Habitat for Humanity, Home in Partnership, New Beginnings (developer of Community Residences for Homeless), other SSO's and some area local governments have already voiced an interest and readiness to undertake NSP grant activities. Lake County will provide loans/grants to these local partners to create the estimated 28 new housing opportunities through NSP funding. Lake County will be the lead agency and maintain the Administrative dollars and some program income for monitoring and oversight functions of the Partners and their implementation progress.

Other Program Requirements:

- Homebuyer Counseling. Any NSP assisted homebuyer must receive at least eight (8) hours of homebuyer counseling from a HUD approved housing counseling agency prior to obtaining a mortgage loan.
- Lender Requirements. The lender of any first mortgage loan provided to an income eligible household must comply with Treasury's guidance for non-traditional mortgages. Compliance must be documented. All loans must be at a fixed rate loans not to exceed a term of forty (40) years.

(9) Projected Start Date: January 15, 2009

(10) Projected End Date: July 30, 2013

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate-Lake County will closely monitor our partners to ensure that the mandatory discount rate of an overall 15% is achieved for the entire portfolio of properties acquired.

For financing activities, include:

- range of interest rates-Lake County will utilize a mixture of loans and grants to our Local Affordable Housing Partners to achieve the maximum benefit to the end purchasers and renters in terms of their long term affordability. When Loans are issued they will never be assessed at a higher interest rate than 1% to the Affordable Housing Partners.

For housing related activities, include:

- duration or term of assistance; Financing Mechanisms assistance will be permanent to our local Development Partners. Program income will be allowed to be maintained by the Partner as long as they guarantee the income is spent in accordance with NSP regulations. Use of program income by partners will be monitored.

- tenure of beneficiaries--rental or homeownership; Both homeownership (25 units) and Rental (3 units) are included in this activity.
- a description of how the design of the activity will ensure continued affordability

Lake County will ensure the long term affordability through the use of recorded Restrictive Use Covenants (for sale units) and MOU's with Partners requiring long term affordability on any rental units. Affordability provisions will remain in place for 20 years for units sold to persons at or above 80% AMI. Affordability provisions will remain in place for 30 years for persons with incomes below 80% of AMI. Additionally, all subsequent purchasers of assisted units must be income eligible or, if any subsequent purchasers of the unit are not-income eligible, the amount of assistance will be recaptured at resale. Recapture provisions will be identical to those established in our SHIP Program, Local Housing Assistance Plan.

Activity # 2: Demolish Blighted Structures

(1) Activity Name: Demolish Blighted Structures with Affordable Housing Partners

(2) Activity Type: ELIGIBLE USE D: Demolish Blighted Structures and CDBG 24CFR 570.201 (d)

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

Lake County's project will directly benefit Low, Moderate, and Middle Income Persons as defined in the NSP Federal Register, published October 6, 2008. We anticipate that a total of 15 income eligible households will be served.

(4) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

Lake County intends to work through our Affordable Housing Partners which may include Lake-Sumter FL Habitat for Humanity, New Beginnings, Homes in Partnership, City Governments, and other Supportive Services Organizations (SSO's) (with the capacity to provide affordable housing and meet NSP goals and requirements) which will be selected by a competitive process to implement the NSP program by utilizing ELIGIBLE USE D: Demolish Blighted Structures. It is our intention to make grants to local Affordable Housing Partners to demolish 15 blighted structures by providing financing for them to demolish blighted structures that they have already foreclosed on.

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

This opportunity to demolish blighted structures was brought to our attention by one of our CDBG Entitlement Partners, the City of Lady Lake. **The neighborhood they are targeting is an eligible neighborhood under our current CDBG program, the Skyline Hills area within the City limits which is specifically Zip Code 32159.** The City has foreclosed on 15 blighted mobile home structures and is interested in the funding to carry out the demolition. The intention is to use future CDBG funds or Habitat for Humanity resources to build new structures for low income families.

(6) Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

<i>Activity</i>	<i>Low Income</i>	<i>Moderate Income</i>	<i>Middle Income</i>	<i>Total</i>
ELIGIBLE USE D: Demolish Blighted Structures	5	10	0	15

Lake County will not acquire, rehab or demolish any housing units directly. All activities and therefore NSP funding will be provided through ELIGIBLE USE D: Demolish Blighted Structures by working with a select number of local Affordable Housing Partners. The estimated cost of each mobile home demolition is \$1,500.00.

(7) Total Budget: \$22,500.00

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

Lake County’s Community Services Department (c/o Bill Gearing, 1300 S. Duncan Drive, Tavares, FL, 32778-7800, phone: 352-742-6515) will conduct a competitive process to select local Affordable Housing Partners. Organizations such as the Lake-Sumter FL Habitat for Humanity, Home in Partnership, New Beginnings (developer of Community Residences for Homeless), other SSO’s and some area local governments such as the **City of Lady Lake** have already voiced an interest and readiness to undertake NSP grant activities. Lake County will provide loans/grants to these local partners to accomplish the demolition of the 15 blighted structures through NSP funding. Lake County will be the lead agency and maintain the Administrative dollars and some program income for monitoring and oversight functions of the Partners and their implementation progress.

Other Program Requirements:

- Homebuyer Counseling. Any NSP assisted homebuyer must receive at least eight (8) hours of homebuyer counseling from a HUD approved housing counseling agency prior to obtaining a mortgage loan.
- Lender Requirements. The lender of any first mortgage loan provided to an income eligible household must comply with Treasury's guidance for non-traditional mortgages. Compliance must be documented. All loans must be at a fixed rate loans not to exceed a term of forty (40) years.

(9) Projected Start Date: January 15, 2009

(10) Projected End Date: July 30, 2013

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate-Lake County will closely monitor our partners to ensure that the mandatory discount rate of an overall 15% is achieved for the entire portfolio of properties acquired.

For financing activities, include:

- range of interest rates-Lake County will utilize a mixture of loans and grants to our Local Affordable Housing Partners to achieve the maximum benefit to the end purchasers and renters in terms of their long term affordability. When Loans are issued they will never be assessed at a higher interest rate than 1% to the Affordable Housing Partners.

For housing related activities, include:

- duration or term of assistance; Financing Mechanisms assistance will be permanent to our local Development Partners. Program income will be allowed to be maintained by the Partner as long as they guarantee the income is spent in accordance with NSP regulations. Use of program income by partners will be monitored.
- tenure of beneficiaries--rental or homeownership; Both homeownership (25 units) and Rental (3 units) are included in this activity.
- a description of how the design of the activity will ensure continued affordability

Lake County will ensure the long term affordability through the use of recorded Restrictive Use Covenants (for sale units) and MOU's with Partners requiring long term affordability on any rental units. Affordability provisions will remain in place for 20 years for units sold to persons at or above 80% AMI. Affordability provisions will remain in place for 30 years for persons with incomes below 80% of AMI. Additionally,

all subsequent purchasers of assisted units must be income eligible or, if any subsequent purchasers of the unit are not-income eligible, the amount of assistance will be recaptured at resale. Recapture provisions will be identical to those established in our SHIP Program, Local Housing Assistance Plan.

Activity # 3: Program Administration

(1) Activity Name: Program Administration

(2) Activity Type: ELIGIBLE USE A: Planning and Administration and CDBG 24CFR 570.206(a)(1)

(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). Not Applicable.

(4) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

NSP Program Administration funds will be utilized to pay reasonable and necessary expenses of implementing Activity # 1 Financing Mechanisms including County staff salaries and overhead and the engagement of a consulting firm to provide assistance.

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

Specifically the service area will include: the Eustis area (Zip Codes 32726 & 32736); the Clermont area (Zip Code 34711); the Leesburg area (Zip Codes 34748 & 34788) and the City of Lady Lake (Zip Code 32159).

(6) Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

<i>Activity</i>	<i>Low Income</i>	<i>Moderate Income</i>	<i>Middle Income</i>	<i>Total</i>
ELIGIBLE USE A: Financing Mechanisms	11	11	6	28
ELIGIBLE USE D: Demolish Blighted Structures	5	10	0	15

Lake County will not acquire, rehab or demolish any housing units directly. All activities and therefore NSP funding will be provided through ELIGIBLE USE A & D by working with a select number of local Affordable Housing Partners.

We anticipate the breakdown of the housing units which will be provided are as follows:

<i>Activity</i>	<i>Income Level</i>	<i># of Units</i>	<i>Average Cost</i>	<i>Total Cost</i>
Purchase assistance-single family	Low	8	\$110,000	\$ 880,000
Purchase assistance-single family	Moderate	11	\$100,000	\$1,100,000
Purchase assistance-single family	Middle	6	\$100,000	\$ 600,000
Purchase assistance-Community residence with supportive services	Low	3	\$ 75,000	\$ 225,000
Demolish Blighted Structures	Low	5	\$ 7,500	\$ 7,500
Demolish Blighted Structures	Moderate	10	\$ 15,000	\$ 15,000

(7) Total Budget: \$309,467.00 (less than 10%)

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

The Lake County Community Services Department under the leadership of Bill Gearing located at 1300 S. Duncan Drive, Tavares, FL. 32778-7800, Phone: 352-742-6515 and a outside consulting firm, yet to be selected.

(9) Projected Start Date: October 20, 2008

(10) Projected End Date: July 30, 2013

(11) Specific Activity Requirements:
For acquisition activities, include:

Not Applicable.

For financing activities, include:

Not Applicable.

For housing related activities, include:
Not Applicable.

Exhibit “A”

**Lake County
Neighborhood Stabilization Program Budget**

Activity	Amount	<u>50% and below</u> Amount	<u>51-80% AMI</u> Amount	<u>81-120% AMI</u> Amount
Planning and Administration	\$ 309,467.00			
Eligible Use A: Financing Mechanisms	\$2,805,000.00	\$1,105,000.00	\$1,100,000.00	\$ 600,000.00
Eligible Use D: Demolish Blighted Structures	\$ 22,500.00	\$ 7,500.00	\$ 15,000.00	\$ -0-
Total Budget	\$3,136,967.00	\$1,112,500.00	\$1,115,000.00	\$ 600,000.00

*Planning and Administration is limited to 10% of Allocation

NSP Allocation \$3,136,967.00

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
Welton G. Cadwell

Date

Chairman, Board of County Commissioners
Title

NSP Substantial Amendment Checklist

For the purposes of expediting review, HUD asks that applicants submit the following checklist along with the NSP Substantial Amendment and SF-424.

Contents of an NSP Action Plan Substantial Amendment

Jurisdiction(s): Lake County, Florida Lead Agency Jurisdiction Web Address: www.lakecountyfl.gov	NSP Contact Person: Bill Gearing, CPM Community Enhancement Coordinator Housing and Community Development Division Lake County Community Services Dept. 1300 S. Duncan Drive, Bldg. E, Room 112 P.O. Box 7800 Tavares, FL 35778-7800 Telephone:352-742-6515 Fax:352-742-6535 Email: WGearing@lakecountyfl.gov
---	--

The elements in the substantial amendment required for the Neighborhood Stabilization Program are:

A. AREAS OF GREATEST NEED

Does the submission include summary needs data identifying the geographic areas of greatest need in the grantee’s jurisdiction?

Yes X No . Verification found on page 4-8.

B. DISTRIBUTION AND USES OF FUNDS

Does the submission contain a narrative describing how the distribution and uses of the grantee’s NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures?

Yes X No . Verification found on page 9.

Note: The grantee’s narrative must address the three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

C. DEFINITIONS AND DESCRIPTIONS

For the purposes of the NSP, do the narratives include:

- a definition of “blighted structure” in the context of state or local law,
Yes X No . Verification found on page 9.
- a definition of “affordable rents,”

Yes X No . Verification found on page 10.

- a description of how the grantee will ensure continued affordability for NSP assisted housing,
Yes X No . Verification found on page 10.
- a description of housing rehabilitation standards that will apply to NSP assisted activities?
Yes X No . Verification found on page 10.

D. LOW INCOME TARGETING

- Has the grantee described how it will meet the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
Yes X No . Verification found on page 11.
- Has the grantee identified how the estimated amount of funds appropriated or otherwise made available will 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% of area median income?
Yes X No . Verification found on page 11-12.
Amount budgeted = \$1,112,500 (35%).

E. ACQUISITIONS & RELOCATION

Does grantee plan to demolish or convert any low- and moderate-income dwelling units?

Yes X No .

Verification found on page 12.

If so, does the substantial amendment include:

- The number of low- and moderate-income dwelling units—i.e., $\leq 80\%$ of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities?
Yes X No . Verification found on page 12.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., $\leq 120\%$ of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion)?
Yes No X. Verification found on page 12.
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income?
Yes X No . Verification found on page 12.

F. PUBLIC COMMENT PERIOD

Was the proposed action plan amendment published via the grantee jurisdiction’s usual methods and on the Internet for no less than 15 calendar days of public comment?

Yes X No . Verification found on page 14-15.

Is there a summary of citizen comments included in the final amendment?

Yes X No . Verification found on page 14.

G. INFORMATION BY ACTIVITY

Does the submission contain information by activity describing how the grantee will use the funds, identifying: ACTIVITY # 1/2

- eligible use of funds under NSP,
Yes X No . Verification found on page 16/19.
- correlated eligible activity under CDBG,
Yes X No . Verification found on page 16/19.
- the areas of greatest need addressed by the activity or activities,
Yes X No . Verification found on page 16/19.
- expected benefit to income-qualified persons or households or areas,
Yes X No . Verification found on page 16/20.
- does the applicant indicate which activities will count toward the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
Yes X No . Verification found on page 17/20.
- appropriate performance measures for the activity,
Yes X No . Verification found on page 17/20.
- amount of funds budgeted for the activity,
Yes X No . Verification found on page 17/20.
- the name, location and contact information for the entity that will carry out the activity,
Yes X No . Verification found on page 17/20.
- expected start and end dates of the activity?
Yes X No . Verification found on page 18/21.
- If the activity includes acquisition of real property, the discount required for acquisition of foreclosed upon properties,
Yes X No . Verification found on page 18/21.

- If the activity provides financing, the range of interest rates (if any),
Yes X No . Verification found on page 18/21.
- If the activity provides housing, duration or term of assistance,
Yes X No . Verification found on page 18/21.
- tenure of beneficiaries (e.g., rental or homeownership),
Yes X No . Verification found on page 18/21.
- does it ensure continued affordability?
Yes X No . Verification found on page 18/21.

H. CERTIFICATIONS

The following certifications are complete and accurate:

- | | | |
|--|------|-----------------------------|
| (1) Affirmatively furthering fair housing | YesX | No <input type="checkbox"/> |
| (2) Anti-lobbying | YesX | No <input type="checkbox"/> |
| (3) Authority of Jurisdiction | YesX | No <input type="checkbox"/> |
| (4) Consistency with Plan | YesX | No <input type="checkbox"/> |
| (5) Acquisition and relocation | YesX | No <input type="checkbox"/> |
| (6) Section 3 | YesX | No <input type="checkbox"/> |
| (7) Citizen Participation | YesX | No <input type="checkbox"/> |
| (8) Following Plan | YesX | No <input type="checkbox"/> |
| (9) Use of funds in 18 months | YesX | No <input type="checkbox"/> |
| (10) Use NSP funds ≤ 120 of AMI | YesX | No <input type="checkbox"/> |
| (11) No recovery of capital costs thru special assessments | YesX | No <input type="checkbox"/> |
| (12) Excessive Force | YesX | No <input type="checkbox"/> |
| (13) Compliance with anti-discrimination laws | YesX | No <input type="checkbox"/> |
| (14) Compliance with lead-based paint procedures | YesX | No <input type="checkbox"/> |
| (15) Compliance with laws | YesX | No <input type="checkbox"/> |