

NEIGHBORHOOD STABILIZATION PROGRAM



Redevelopment of Abandoned and Foreclosed Homes

Prepared by
**Orange County
Housing and Community
Development Division**
525 East South Street
Orlando, Florida 32801
407-836-5150
www.ocfd.net

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EXECUTIVE SUMMARY

Title III of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289 approved in July 30, 2008, appropriated \$3.92 billion for emergency assistance to States and units of government for the redevelopment of abandoned and foreclosed upon homes and residential properties. The funding created under this law, is considered part of the Community Development Block Grant (CDBG) program and regulated by the U.S. Department of Housing and Urban Development (HUD). It is referred to as the Neighborhood Stabilization Program (NSP). Orange County, Florida has received a special allocation of \$27.9 million under the NSP to stabilize neighborhoods that have been negatively impacted by foreclosed and abandoned properties. NSP funding targets financial resources to respond to the decline of neighborhoods as a result of the housing crisis.

As required by federal guidelines for housing and community development programs, a substantial amendment to the Orange County's Annual Action Plan is necessary to allow for NSP activities and expedite the use of the special funding allocation. The NSP Plan was made available at the Orange County Library, the Orange County Housing and Community Development Division. The Plan was also posted on the Orange County's website at: www.ocfl.net/housing. The Plan was made available for public input from November 4 to November 24, 2008. Public comments to the plan and responses to these comments have been incorporated as part of this document and included in Section II.F.

Orange County has developed an NSP strategy that can help neighborhoods become more stable, sustainable, competitive, and integrated into the overall economic fabric of our community. This strategy involved two phases of planning and research:

- First, the selection of areas or neighborhoods with the greatest needs based on comprehensive research and established program criteria; and
- Second, the formulation of eligible activities to ensure that the goals of the program are met, as well as the challenging timelines for program delivery.

For the process of selecting NSP neighborhoods, Orange County's strategy followed HUD's criteria for selection of areas with the greatest need, and included:

- Neighborhoods with the highest number of home foreclosures.
- Neighborhoods with the highest number of homes financed by subprime lending.
- Neighborhoods that will likely face a significant rise in the rate of home foreclosures in the near future.
- Neighborhoods that will likely have a high number of blighted areas and abandoned properties.

Other factors that were also taken in consideration were:

- Neighborhoods that are experiencing destabilization due to an increase in crime.

- Neighborhoods with a high number of bank owned properties that could be offered at reasonable price points to ensure long term affordability for future homeowners.

A summary of data identifying the geographic areas of greatest need in Orange County is provided in Section II A of the NSP Amendment, “Areas of Greatest Need”. Based on our research, analysis and criteria described above, Orange County will utilize NSP funding to help stabilize the following neighborhood areas:

Meadowoods
Pine Hills
Azalea Park
Holden Heights/Oak Ridge
Union Park

Program activities will be concentrated in acquiring discounted housing units, increasing homeownership rates in affected areas through financing mechanisms, and in providing affordable rental housing to lower income residents in the midst of challenging economic times. Orange County will implement the following activities under NSP:

1. Acquisition, rehabilitation and sale of homes that have been abandoned or foreclosed upon
2. Acquisition and rehabilitation of foreclosed properties for rental housing
3. Demolition of blighted properties
4. Redevelopment of demolished or vacant properties
5. Financing mechanisms for the homeownership activities

It is our belief that the proposed NSP Plan will enhance the economic well-being of the proposed targeted neighborhoods, thus contributing to the overall economic stability of Orange County.

THE NSP SUBSTANTIAL AMENDMENT

| | |
|-------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| Jurisdiction(s): Orange County, Florida <i>(identify lead entity in case of joint agreements)</i> | NSP Contact Person: Mitchell Glasser |
| Jurisdiction Web Address: www.ocfl.net/housing | Address: 525 E. South Street Orlando, Florida 32801 |
| | Telephone: (407) 836-5191 |
| | Fax: (407) 836-5193 |
| | Email: Mitchell.glasser@ocfl.net |

A. AREAS OF GREATEST NEED

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

Response:

Orange County, Florida, under the Neighborhood Stabilization Program (NSP) of the 2008 Housing and Economic Recovery Act (HERA), has received a special allocation of \$27.9 million to address the needs of neighborhoods affected by a high number of home foreclosures. The main purpose of the NSP is to stabilize neighborhoods that have been negatively impacted by foreclosed and abandoned properties. NSP funding targets financial resources to respond to the decline of neighborhoods as a result of the housing crisis. Orange County will use this funding to conduct eligible activities that will stabilize and develop distressed neighborhoods.

Despite years of steady growth and a vigorous housing market, Orange County now faces a severe housing market decline due to the ripple effects of a weakening economy. Last spring, WFTV-Channel 9 reported that Orlando has more vacant homes than any city in the United States, leading the nation with 7.4 percent of home vacancy rates according to the U.S. Census Bureau (March, 2008). Vacancy rates are important indicators for real estate not only because they drive price trends but they also pose a risk on neighborhoods by altering their economic stability and physical appearance. The high number of vacant properties in Orange County is attributed to the rising housing foreclosure activity during the past three years.

From 2006 to September 2008, over 15,855 records of foreclosure activity in Orange County have been filed. Orange County now ranks among the top foreclosure markets nationwide. Table 1 shows the total records of pre-foreclosures, auctions and bank repossessions in Orange County from 2006-2008. To date, foreclosure activity in 2008 is almost seven times higher than in 2006.

Table 1: Orange County Foreclosure Activity

Foreclosure Activity in Orange County

| | 2006 | 2007 | 2008 |
|-------------------------|--------------|--------------|---------------|
| Pre-Foreclosures | 1,380 | 2,517 | 8,359 |
| Auctions | 115 | 755 | 489 |
| Bank Repos | 80 | 484 | 1,676 |
| Total Actions | 1,575 | 3,756 | 10,524 |

Source: RealtyTrac, records from 2006-Sept.30,2008

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The Orlando Sentinel conducted an analysis of public records gathered by Realty Trac, Inc. and found that the foreclosure problem is distributed throughout Orange County, overcoming differences in income, race, ethnicity and geography¹. While this trend may not be unique when compared to other jurisdictions in the State of Florida, foreclosure trends in Orange County seem more evident in low to middle income areas due to the number and proximity of foreclosure clusters.

Our analysis of foreclosures have revealed that the crisis extends to established, older neighborhoods such as Pine Hills and Azalea Park, as well as newer neighborhoods like Avalon Park and Meadowoods. Many of the affected areas demonstrate high concentrations of subprime lending activity. According to a study conducted by Temple University Center for Public Policy in 2001, every foreclosure within one-eighth of a mile reduces the value of a single family home by 1.0-1.4 percent. Furthermore, a study in

¹ "As Foreclosures Rise, Dreams Die", The Orlando Sentinel, October 14, 2007

Philadelphia found that being 150 feet from an abandoned property decreases housing values by \$7,600².

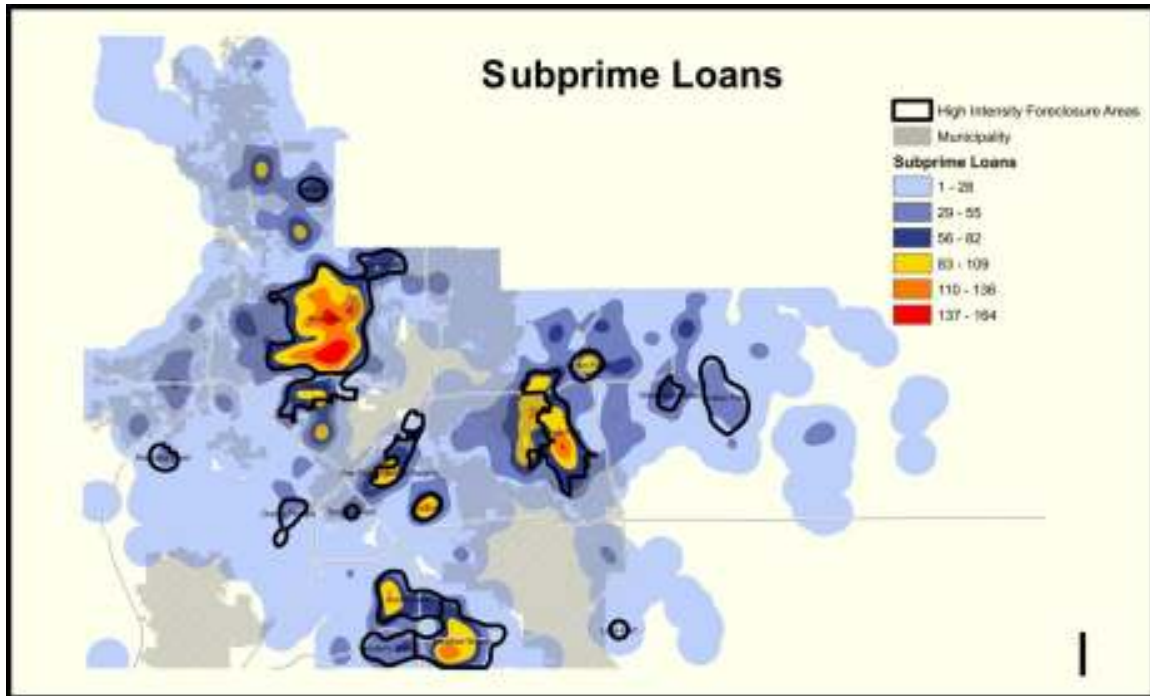
Exhibit A: Foreclosure Trends by Area of Concentration in Orange County, Florida

Source: RealtyTrac, Inc.

² Apgar, William, and Duda, Mark. (2005). *Collateral Damage: The Municipal Impact of Today's Mortgage Foreclosure Boom*. Washington, DC: Homeownership Preservation Foundation.

of the areas representing a high volume of subprime lending activity exhibit a direct correlation to areas with the highest foreclosure activity.

Exhibit B: Orange County Subprime Loan Activity



Source: First American CoreLogic

As hundreds of homes continue to go into foreclosure, the social impact on our neighborhoods becomes evident. Homelessness, crime and neighborhood instability is on the rise. Vacancies and abandoned properties have become a magnet for vandalism and criminal activity. This increase in criminal activity is now most notable in areas deeply affected by foreclosures including Pine Hills, Azalea Park, Meadowoods, Union Park and Holden Heights. Local initiatives by residents and local churches are beginning to form in these neighborhoods to crack down on crime.

NSP grantees must target funds to areas with the greatest need. Orange County's NSP strategy will follow HUD's criteria for selection of neighborhoods and will be targeted to neighborhoods with the greatest need, exhibited by the following patterns:

- Neighborhoods with the highest number of home foreclosures.
- Neighborhoods with the highest number of homes financed by subprime lending.
- Neighborhoods that will likely face a significant rise in the rate of home foreclosures in the near future.
- Neighborhoods that will likely have a high number of blighted areas and abandoned properties.

In addition to the above referenced criteria, Orange County's rationale for the selection NSP target neighborhoods will be based on the following:

- The neighborhoods that are experiencing destabilization due to an increase in crime.
- Bank owned properties in the neighborhood are being offered at reasonable price points that will ensure long term affordability for future homeowners.

Appendix D Map.1 presents the areas in Orange County with a high number of foreclosures with home values under \$200,000. These areas present the most feasible opportunities for long term affordability for future homeowners. Based on our analysis and using the established criteria in determining NSP target neighborhoods, Orange County is proposing to utilize NSP funding to help stabilize the following priority neighborhoods with the most pressing stabilization needs:

Meadowoods
Pine Hills
Azalea Park
Holden Heights/Oak Ridge
Union Park

Appendix D, Maps 2-6 show the selected neighborhoods and the proposed NSP area boundaries. Our neighborhood stabilization strategy is primarily aimed at ensuring that most of the foreclosed units become owner occupied units and serve as a source of long term affordable rental opportunities to lower income households. Efforts will be concentrated in acquiring discounted housing units, increasing homeownership rates in affected areas through financing mechanisms, and in providing very affordable rental housing to Orange County residents in the midst of challenging economic times.

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:

For more than 25 years, Orange County has allocated most of its Community Development Block Grant (CDBG) funds in targeted areas that demonstrate the greatest needs and opportunities for revitalization as determined by socio-economic criteria and

trends. More recently, increasing numbers of foreclosures and their negative impacts on neighborhoods have worked against our efforts to stabilize communities.

In order to efficiently utilize funding from the neighborhood stabilization program, Orange County will prioritize areas that demonstrate the following characteristics:

1. Greatest number of home foreclosures.
2. Highest number homes financed by subprime mortgage related loans; and
3. Areas identified by unit of general local government as likely to face a significant rise in the rate of home foreclosures.

To effectively mitigate the negative impacts of foreclosures on neighborhoods, Orange County will utilize the following activities to distribute NSP funding within our targeted communities:

1. Acquisition, rehabilitation and disposition for homeownership and rental activities;
2. Financing mechanisms for purchase and redevelopment of foreclosed homes and residential properties such as gap financing, lease purchase assistance, down payment, and closing cost assistance;
3. Demolition of blighted structures;
4. Redevelopment of demolished or vacant properties; and
5. Administration will not exceed 10 percent of the grant plus 10 percent of any program income.

The targeted beneficiaries of the programs administered under our NSP will be low income, moderate income and middle income households. Additionally, NSP funding may also be used to assist homeless or disabled individuals. [Appendix A](#) of this document shows the NSP budget outlining the dollar distribution and uses of funds.

Based on our analysis of foreclosure and subprime lending data, the funds will be used as described in [Section G, NSP Information by Activity](#) of this Plan for the areas of Pine Hills, Meadowoods Azalea Park, Holden Heights/Oakridge and Union Park.

C. DEFINITIONS AND DESCRIPTIONS

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

Response:

For the purpose of the NSP strategy, Orange County will utilize the definition established in the Federal Register Notice/Vol.73, no. 194 of October 6, 2008. A blighted structure is one that exhibits signs of deterioration sufficient to constitute a threat to human health, safety and public welfare. In addition, blighted properties may exhibit one or more of the definitions for unsafe structures in accordance to Orange County’s Code Regulation.

- (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:

For the purpose of the NSP, the term “affordable rents” is defined as:

- The rent does not exceed 30 percent of the annual income of a family whose income is at or below 50 percent of the Area Median Income, as determined by HUD, adjusted for unit size (HOME rent schedule for low Home rents will be utilized).
- (3) **Describe how the grantee will ensure continued affordability for NSP assisted housing.**

Response:

To ensure long term affordability of the units assisted under the NSP Plan, Orange County will utilize the following mechanisms:

- **Homebuyer Activities-** A non-amortizing fifteen (15) year second mortgage document will be used to ensure affordability and enforcement of our recapture provisions. Under the new construction or acquisition of new housing activity, the minimum affordability period will be twenty (20) years. If the property changes ownership or ceases to be owner occupied, the principal amount of the loan provided shall be due and payable. The second mortgage will be forgiven after fifteen (15) years for existing housing and 20 years for new construction.
- **Rental Activities-** A non-amortizing twenty (20) year Land Use Restriction Agreement will be used to ensure long term affordability and enforcement of our recapture provisions. Rents will remain affordable for a period of 20 years.

Additionally, NSP assisted activities will be monitored for program compliance during the period of affordability. Annual on-site inspections will be conducted of rental units to determine compliance with Housing Quality Standards.

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

Response:

All housing units will comply with minimum housing code standards as defined in Orange County Housing Code Regulation and will also comply with Orange County’s rehabilitation standards for its homeowner rehabilitation program. In addition, energy

conservation will be stressed on all NSP Units. Professional energy audits will be conducted and recommendations for improving energy efficiency will be performed such as but not limited to caulking, weather stripping, duct sealing, and insulation. The HVAC system will be professionally inspected and evaluated to assume proper operation. All replacement appliances will be energy star compliant. The all the rehabilitation work will be performed by qualified personnel. Any required building permits will be pulled with the Orange County Building Division by the vendor performing the work.

All pre-existing code violations and health and safety hazards will be a priority for all NSP assisted units. Any home that requires lead base paint testing will be performed and any lead based paint hazards will be eliminated. A termite inspection report will be prepared for every NSP home by a licensed inspector. If the report identifies any termites or dry rot damage wood or any active termite infestation, then treatments with appropriate insecticides will occur and damaged wood will be replaced.

General property improvements will also be addressed and may cover a wide variety of items such as painting, replacement of fixtures, cabinets, and flooring.

(5) Other definitions not previously included in Orange County's Consolidated and Annual Action Plans:

- **Affordable sales price-** For the purpose of the NSP program, affordable sales price is a price point that is affordable to a household at 120 percent or less of the Area Median Income (AMI). The housing unit is considered affordable if monthly housing costs, including mortgage payment, taxes and insurance, do not exceed a reasonable percentage of a family's monthly income. This percentage usually ranges from 30-35 percent of a household's gross monthly income. Generally, a home should not exceed \$200,000 for a family making 120 percent of the AMI for Orange County, to meet this criterion of affordability.
- **Subprime lending-** This is a financial term that refers to a security or financial mechanism used to provide credit to borrowers that have a heightened perceived risk of default. Due to the perceived risk of the borrower, subprime loans carry higher fees and higher interest rates. For the purpose of the NSP, subprime lending is defined as a loan or mortgage financing instrument that does not conform to conventional or FHA underwriting standards.
- **Abandoned property-** For the purpose of the NSP program, Orange County will use the definition for abandoned property established in the Federal Register Notice/Vol.73, no. 194 of October 6, 2008. An abandoned property is a property that has been abandoned when mortgage or tax foreclosure proceedings have been initiated for that property, no mortgage or tax payments have been made by the property owner for at least 90 days and the property has been vacant for at least 90 days.

- **Neighborhood-** A neighborhood is defined as an area with distinctive characteristics in which residents live near one another.
- **Low, Moderate, Middle Income Households (LMMH)-** Households that can benefit from the NSP are considered low income (under 50 percent of AMI), low to moderate income (under 80 percent of AMI) and middle income (under 120 percent of AMI).
- **Current market appraised value.** The current market appraised value means the value of a foreclosed upon home or residential property that is established through an appraisal made in conformity with the appraisal requirements of the URA at 49 CFR 24.103 and completed within 60 days prior to an offer made for the property by a grantee, subrecipient, developer, or individual homebuyer.

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: \$29,000 for a family of four in Orange County.

Response:

At a minimum, Orange County will set aside 25 percent of the total NSP allocation plus program income for individuals or families whose incomes do not exceed fifty percent (50%) of Orange County's area median income. Households in this income group make \$29,600 or less annual income for a family of four, adjusted by household size.

The low income targeting requirement represents approximately \$7 million of the total NSP funding allocation plus 25 percent of any program income. Activities to serve this population will include homeownership and rental housing activities. In addition to homeownership activities, Orange County intends to establish financing mechanisms for purchase and redevelopment of foreclosed residential properties to provide affordable rental housing that is targeted to this income group. Besides the low-income families, the 25 percent set aside will also target special needs populations that include but are not limited to elderly, disabled, families at risk of homelessness and disabled veterans.

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:

As part of the acquisition process of foreclosed homes, if the cost to rehabilitate the unit is greater than 50 percent (50%) of the acquisition price, and/or the cost of acquisition and rehabilitation exceeds one hundred percent (100%) loan to value, the county will evaluate the property to determine if demolition is an option. If demolition is economically feasible, the county will use NSP funds and/or other county affordable housing funds to construct a new unit. The county will follow the Uniform Relocation Act requirements for any affected household where a housing unit is being demolished that has not been vacant for greater than ninety (90) days.

It is also conceivable that our efforts to stabilize neighborhoods may be diminished by the presence of blighted structures in close proximity to our NSP activities. To mitigate the adverse affects of these structures, we will demolish structures in our target areas that are deemed unfit for habitation. We anticipate that the following units will be demolished and corresponding income levels assisted under our demolition activity:

- Ten (10) units expected to be demolished or converted at an Area Median Income below 50 percent
- Ten (10) units expected to be demolished or converted at an AMI between 51 percent to 80 percent of the AMI
- Ten (10) units expected to be demolished or converted at an AMI between 81 percent to 120 percent of the AMI

F. PUBLIC COMMENTS

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

Response:

The NSP Plan is available for public comment at Orange County Public Library, the Orange County Housing and Community Development Division and the Division's web page from November 4, 2008 to November 24, 2008. A Public Notice was advertised on November 2, 2008 to inform citizens of the planned activities and citizens comment period. Orange County's responses to citizens' comments will be incorporated in the NSP Plan as Appendix F.

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

ACTIVITY #1: ACQUISITION, REHABILITATION AND SALE OF HOMES THAT HAVE BEEN ABANDONED OR FORECLOSED UPON

(1) **Activity Name:** Acquisition, Rehabilitation and Sale

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

The following eligible activities will be conducted:

- Acquisition (24 CFR 570.201 (a))
- Disposition (24 CFR 570.201 (b))
- Rehabilitation and preservation activities (24 CFR 570.202(a))
- Activity Delivery Costs for an eligible activity (24 CFR 570.206)
- Homeownership assistance (570.201(n))

(3) **National Objective:**

To benefit low, moderate and middle income households (as defined in the NSP Notice—i.e., $\leq 120\%$ of AMI and 24 CFR 570.208(a)(3)).

(4) **Projected Start Date:** January 15, 2009

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

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

Organization: Orange County Housing and Community Development Division
Contact: Mitchell Glasser, Division Manager
Address: 525 E. South Street, Orlando, FL 32801

The primary responsible organization is Orange County, Housing and Community Development Division. Selected non profit housing development organizations will be participating in the implementation of the NSP as well as other private sector organizations.

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

Program activities will be implemented in the following NSP targeted neighborhoods: Meadowoods, Pine Hills, Azalea Park, Holden Heights/ Oak Ridge and Union Park.

(8) **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.

Orange County will implement the NSP activities in partnership with several local not for profit housing development organizations. The organizations to be selected must have demonstrated capacity, financial accountability and experience in providing a variety of affordable housing related services to participate in the delivery of program services. The selection of private companies to provide services will be conducted in a manner that is consistent with Orange County's purchasing requirements and applicable federal guidelines. We will also utilize the staff resources within Orange County to acquire, rehabilitate, and sell properties.

A. Acquisition Of Foreclosed Upon Properties for Sale

The Housing and Community Development Division will work closely with the participating not for profit housing development organizations to identify suitable properties within the targeted neighborhoods. The properties will be purchased at a 5 percent discount of the current appraised value or 15 percent discount on bulk purchase of properties from financial institutions. Once the acquisition has been consummated, the not for profit agency will solicit bids for rehabilitation work to be conducted. An aggressive marketing plan in conjunction with local housing counseling agencies, will be initiated to secure qualified buyers.

To ensure long term affordability, Orange County will provide gap financing that will be determined on a case by case basis for an amount not to exceed \$35,000. Additionally, down payment assistance equal to 50 percent of the amount required will also be provided as well as closing cost assistance. A 15 year non-amortizing second mortgage will be recorded on the property. The second mortgage will be due and payable if the property is sold or ceases to be owner occupied.

Participating not for profit organizations will be provided a reasonable compensation for services related to acquisition, maintenance, and rehabilitation. The tenure of the beneficiaries is homeownership.

B. Rehabilitation of Homes for Sale

Homes acquired under NSP will be inspected and assessed for rehabilitation needs. Repairs will be conducted on acquired properties to ensure compliance with local code and to increase the sustainability, comfort and safety of these properties. Rehabilitation of acquired properties will adhere to the rehabilitation standards established in [Section C \(4\), Definitions and Description, Housing Rehabilitation Standards](#), of the NSP plan. All work conducted will be subject to federal and local compliance, included but not limited to local codes, lead base paint requirements, environmental regulations and procurement procedures.

C. Disposition of Homes for Sale

The sales price of the home to a qualified buyer will not exceed the initial acquisition and rehabilitation costs. The properties will be offered to homebuyers with an annual income below 120 percent AMI. Additionally, the buyer should not have ownership interest in any real estate property at the time of purchase. [Appendix B](#) shows the income limits for the program as adjusted for family size. Once the home is sold, any program income received from the sale or rental of assisted units will be recycled for eligible NSP activities. Orange County will use financing mechanisms such as gap financing, down payment, closing costs assistance and lease purchase incentives to sell the homes. Qualified homebuyers must complete 8 hours of housing counseling by an approved counseling agency prior to purchasing NSP homes.

In accordance with NSP regulations, a profit cannot be earned on the sale of these properties. The County has the right to limit the number of properties to be acquired by the participating non profit housing agencies based on capacity and other risk factors. If a property has not been sold after 24 months, the property may be offered as an affordable rental or lease purchase activity.

(9) Total Budget: (Include public and private components)

| Activity | NSP funds |
|---------------------------------------------|--------------|
| Acquisition of foreclosed homes for sale | \$13,500,000 |
| Rehabilitation | \$ 1,500,000 |
| Acquisition and Disposition (closing costs) | \$ 500,000 |
| Relocation | |
| Acquisition Total | \$15,500,000 |

(10) 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):

An important component of the NSP is our obligation to assess program performance. Please refer to [Appendix C](#) for the anticipated Performance Measurements, organized around the five major activities to be implemented under NSP.

ACTIVITY #2: ACQUISITION AND REHABILITATION OF FORECLOSED PROPERTIES FOR RENT

(1) **Activity Name:** Rental Housing

(2) **Activity Type:** The following eligible activities will be conducted:

- Acquisition (570.201 (a))
- Disposition (570.201 (b))
- Rehabilitation and preservation activities (24 CFR 570.202(a))
- Activity Delivery Costs for an eligible activity (24 CFR 570.206)

(3) National Objective:

To benefit low, moderate and middle income households (as defined in the NSP Notice—i.e., $\leq 120\%$ of AMI and 24 CFR 570.208(a)(3)).

(4) Projected Start Date: January 15, 2009

(5) Projected End Date: July 31, 2013

(6) Responsible Organization:

Organization: Orange County Housing and Community Development Division
 Contact: Mitchell Glasser, Division Manager
 Address: 525 E. South Street, Orlando, FL 32801

(7) Location Description:

Program activities will be implemented in the following NSP targeted neighborhoods: Meadowoods, Pine Hills, Azalea Park, Holden Heights/ Oak Ridge and Union Park.

(8) Activity Description:

A. Acquisition for Rental Housing

This activity consists of purchasing foreclosed homes or residential properties in partnership with non profit housing development organizations to provide rental housing. Most of the units acquired for rental activities will be designated for very low income persons (earning 50 percent or below AMI). This activity is targeted to meet the required 25 percent of NSP funds for this income category. The properties may consist of single family or multifamily housing. While most of the housing will be for low income families, some of the single family units owned by participating non profit housing agencies will be made available at affordable rental rates for households at income levels up to 120 percent. In keeping with the goals and objectives of the NSP, Orange County may acquire and renovate a rental complex that is located outside of the NSP target areas, but meets the definition of a neighborhood as defined on page 14, and has been foreclosed upon or abandoned.

The tenure of the beneficiaries is affordable rental housing. The duration of the assistance will be determined by a Land Use Restriction Agreement (LURA) for a period no less than 15 years. Properties purchased for rental housing will be obtained at a discounted rate of no less than 5 percent discount of the current market appraised value or a minimum 15 percent discount for bulk purchases.

B. Rehabilitation

Acquired foreclosed homes and residential properties will be inspected and assessed for rehabilitation needs. Rehabilitation will be conducted on these properties to ensure compliance with local code and to increase the sustainability, comfort and safety of these properties. Rehabilitation of acquired properties will adhere to the rehabilitation standards established in [Section C \(4\), Definitions and Descriptions](#) of the NSP plan. All work conducted will be subject to federal and local compliance, included but not limited to local codes, lead based paint requirements, environmental regulations and procurement procedures.

C. Disposition of Acquired Properties for Rent

Eligible participating non profit housing agencies will acquire title and ownership of the property to serve individuals and families at 50 percent AMI. Continued affordability will be ensured through a contractual Land Use Restriction Agreement for a minimum of 20 years. Annual monitoring of the properties will be conducted to ensure continued affordability of the property. Any loans, deferred mortgages and/or financing mechanisms used in conjunction with this activity will be at below market interest rates (0-4 percent) as necessary to make the project feasible and affordable to the targeted income group which is households at or below 50 percent AMI. Should any rental gap be present, funds for this gap will be required from other sources of funding. If the property is sold or does not meet affordable rental programmatic requirements, Orange County will have the right to begin legal action to reclaim ownership or transfer of the property to another qualified non profit housing agency.

(9) Total Budget: (Include public and private components)

| | NSP funds |
|------------------------------------------|------------------|
| Acquisition of foreclosed homes for rent | \$3,000,000 |
| Rehabilitation | \$1,000,000 |
| Disposition and related costs | \$ 50,000 |
| Relocation | \$ 100,000 |
| Total | \$4,150,000 |

(10) Performance Measures:

An important component of the NSP is our obligation to assess program performance. Please refer to [Appendix C](#) for the anticipated Performance Measurements, organized around the five major activities to be implemented under NSP.

ACTIVITY #3: DEMOLITION OF BLIGHTED PROPERTIES

(1) **Activity Name:** Demolition

(2) **Activity Type:** The following eligible activities will be conducted:

- Clearance of blighted structures only (24 CFR 570.201(d))

(3) **National Objective:**

To benefit low, moderate and middle income households (as defined in the NSP Notice—i.e., $\leq 120\%$ of AMI and 24 CFR 570.208(a)(3)).

(4) **Projected Start Date:** January 15, 2009

(5) **Projected End Date:** July 31, 2013

(6) **Responsible Organization:**

Organization: Orange County Housing and Community Development Division

Contact: Mitchell Glasser, Division Manager

Address: 525 E. South Street, Orlando, FL 32801

(7) **Location Description:**

Program activities will be implemented in following NSP targeted neighborhoods: Meadowoods Area, Pine Hills, Azalea Park, Holden Heights and Union Park.

(8) **Activity Description:**

The activity addresses the need to create decent and suitable living environments in NSP neighborhoods. While the activity initially may not benefit income qualified persons individually, all properties demolished will provide an area benefit to qualified low to moderate income NSP neighborhoods. The activity applies to structures located in NSP neighborhoods that are considered a threat to human health, safety and public welfare. Demolition of blighted properties may be considered necessary to mitigate the adverse effects that blighted structures have on property values and neighborhood appearance. In some instances, the land will remain vacant or may be sold or donated for affordable housing. To facilitate the demolition of blighted properties, a land bank entity may be used to assist in implementing this activity. If the blighted structure was acquired and demolished with NSP funds for either homeownership or rental activities, long term affordability requirements described in Activity #1 (Disposition of homes for sale) and Activity #2 (Disposition of Acquired Properties for rent) will apply. In this case, the tenure of the beneficiaries of this activity may be rental or homeownership.

(9) Total Budget: (Include public and private components)

| Activity | NSP Funds |
|-----------------------------------|-----------|
| Demolition of blighted properties | \$225,000 |
| Relocation | \$ 25,000 |
| Other related costs | 0 |
| Total | \$250,000 |

(10) Performance Measures

An important component of the NSP is our obligation to assess program performance. Please refer to [Appendix C](#) for the anticipated Performance Measurements, organized around the five major activities to be implemented under NSP.

ACTIVITY#4: REDEVELOPMENT OF DEMOLISHED OR VACANT PROPERTIES

(1) Activity Name: Redevelopment

(2) Activity Type: The following eligible activities will be conducted:

- Acquisition (24 CFR 570.201 (a))
- Disposition (24 CFR 570.201 (b))
- Relocation (24 CFR 570.201 (i))
- Activity Delivery Costs for an eligible activity (24 CFR 570.206)
- Direct Homeownership assistance (570.201(n))
- New construction (as modified by NSP)

(3) National Objective:

To benefit low, moderate and middle income households (as defined in the NSP Notice—i.e., ≤ 120% of AMI and 24 CFR 570.208(a)(3)).

(4) Projected Start Date: January 15, 2009

(5) Projected End Date: July 31, 2013

(6) Responsible Organization:

Organization: Orange County Housing and Community Development Division

Contact: Mitchell Glasser, Division Manager

Address: 525 E. South Street, Orlando, FL 32801

(7) Location Description:

Program activities will be implemented in the following NSP targeted neighborhoods: Meadowoods, Pine Hills, Azalea Park, Holden Heights/Oak Ridge Area and Union Park.

(8) Activity Description:

In certain instances, the condition of specific units may warrant demolition instead of rehabilitation. A primary basis of this activity would be the proposed cost of rehabilitation or existing blighted condition. In such cases where rehabilitation is not feasible, staff will consult with the County's Building Official regarding the structural soundness of the property. When appropriate, demolition will occur. Several redevelopment options will be considered under this scenario: One option is to sell or donate the parcel to a non profit organization serving special needs populations. Another option is to construct single family units for rent or sale to LMMH or allow that the parcel be used for the expansion or improvement of a public facility. Another variation of the activity is to acquire vacant properties for rental or homeownership activities.

It is also conceivable that our efforts to stabilize neighborhoods may be diminished by the presence of blighted structures in close proximity to our NSP activities. To mitigate the adverse affects of these structures, we will demolish structures in our target areas that are deemed unfit for habitation. We anticipate that the following units will be demolished and corresponding income levels assisted under our demolition activity:

These properties may be redeveloped into affordable rentals or owner occupied units through new construction. To facilitate the redevelopment of properties, a land bank entity may be used to assist in implementing this activity. The tenure of the beneficiaries of these activities is both homeownership and rental, as necessary.

(9) Total Budget: (Include public and private components)

| Activity | NSP funds |
|----------------|-------------|
| Reconstruction | \$1,064,596 |
| Total | \$1,064,596 |

(10) Performance Measures

An important component of the NSP is our obligation to assess program performance. Please refer to [Appendix C](#) for the anticipated Performance Measurements, organized around the five major activities to be implemented under NSP.

ACTIVITY #5: FINANCING MECHANISMS FOR HOMEOWNERSHIP ACTIVITIES

(1) Activity Name: Establish financing mechanisms for the purchase, rehabilitation, sale and/or redevelopment of foreclosed properties to provide homeownership to income eligible (LMMH) individuals and families.

(2) Activity Type: §2301(c)(3)(A) establishes financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties. In addition and as part of an activity delivery cost for an eligible activity as defined in **24 CFR 570.206**,

financing mechanisms will be provided in connection with the following eligible activities:

- Acquisition (24 CFR 570.201(a))
- Disposition (24.CFR.570.201.(b))
- Direct homeownership assistance (as modified by NSP eligible uses)
- Rehabilitation (24 CFR 570.202)
- Activity Delivery Costs (as modified by NSP eligible uses)

(3) National Objective:

To benefit low, moderate and middle income households (as defined in the NSP Notice—i.e., $\leq 120\%$ of AMI and 24 CFR 570.208(a)(3)).

(4) Projected Start Date: January 15, 2009

(5) Projected End Date: July 31, 2013

(6) Responsible Organization:

Organization: Orange County Housing and Community Development Division
Contact: Mitchell Glasser, Division Manager
Address: 525 E. South Street, Orlando, FL 32801

(7) Location Description:

Program activities will be implemented the following NSP targeted neighborhoods: Meadowoods, Pine Hills, Azalea Park, Holden Heights/Oak Ridge and Union Park.

(8) Activity Description:

This NSP activity will to provide financial mechanisms related to acquisition, rehabilitation and sale of homes to LMMH homebuyers. The tenure of the beneficiaries is homeownership. To ensure long term affordability, a restrictive covenant will be recorded for a minimum 15 year period; 20 years if the activity is in connection with new construction.

Financial mechanisms will include gap financing, down payment and closing costs assistance, and lease purchase incentives. The assistance will be structured as a forgivable 0 percent interest loan over a period of 15 years. However, the full amount of the assistance will be repayable if the property changes title or homeownership requirements within the first 15 years.

(9) Total Budget: (Include public and private components)

| Financing Mechanisms | NSP Funds |
|----------------------------------|------------------|
| Down payment | \$ 400,000 |
| Closing costs | \$1,000,000 |
| Gap Financing (second mortgages) | \$3,000,000 |
| Totals | \$4,400,000 |

(10) Performance Measures:

An important component of the NSP is our obligation to assess program performance. Please refer to [Appendix C](#) for the anticipated Performance Measurements, organized around the five major activities to be implemented under NSP.

ACTIVITY #6: ADMINISTRATION

(1) Activity Name: Administration

(2) Activity Type: Administration costs are eligible use under the following activities:

- 24 CFR 570.206(1)
- 24 CFR 570.206(a)(1)

(3) National Objective:

To benefit low, moderate and middle income households (as defined in the NSP Notice—i.e., $\leq 120\%$ of AMI and 24 CFR 570.208(a)(3)).

(4) Projected Start Date: January 15, 2008

(5) Projected End Date: July 31, 2014

(6) Responsible Organization:

Organization: Orange County Housing and Community Development Division
Contact: Mitchell Glasser, Division Manager
Address: 525 E. South Street, Orlando, FL 32801

(7) Location Description: Orange County Housing and Community Development Division, 525 E. South Street, Orlando, FL 32801

(8) Activity Description:

NSP funds will be used to pay for program relation administration costs related to the planning and execution of all listed activities including but not limited to program management, program implementation, planning, reporting, monitoring other costs associated to direct and indirect charges for the program.

I. Total Budget:

Ten (10) percent of the total NSP allocation plus 10 percent of program income, and staff salaries.

J. Performance Measures :

An important component of the NSP is our obligation to assess program performance. Please refer to [Appendix C](#) for the anticipated Performance Measurements, organized around the five major activities to be implemented under NSP.

100 percent of the allocation will be expended within 18 months.

APPENDIX A

**ORANGE COUNTY
NEIGHBORHOOD STABILIZATION PROGRAM BUDGET
JANUARY 1, 2009 THROUGH JUNE 30, 2010**

| ACTIVITIES | AMOUNT |
|--------------------------------------------|-------------------|
| Acquisition of single Family Properties | 14,000,000 |
| Rehabilitation of Single Family Properties | 1,500,000 |
| Demolition of Blighted Properties | 250,000 |
| Acquisition of Rental Properties | 3,000,000 |
| Rehabilitation of Rental Housing | 1,000,000 |
| Redevelopment of Residential Housing | 1,064,596 |
| Financing Mechanisms: | |
| Downpayment Assistance | 400,000 |
| Gap Financing | 3,000,000 |
| Closing Costs | 1,000,000 |
| PROGRAM DELIVERY COSTS | 897,000 |
| | |
| ADMINISTRATION | 1,790,177 |
| | |
| GRAND TOTAL | 27,901,773 |

APPENDIX B
NSP Program Income Limits
2008 Median Area Family Income in Orange County, Florida
\$59,200

| Persons in Household | Very Low to Low Income 50% | Low Income to Moderate 80% | Moderate to Middle Income 120% |
|-----------------------------|---------------------------------------|---------------------------------------|-------------------------------------------|
| 1 | \$20,700 | \$33,150 | \$49,680 |
| 2 | \$23,700 | \$37,900 | \$56,880 |
| 3 | \$26,650 | \$42,600 | \$63,960 |
| 4 | \$29,600 | \$47,350 | \$71,040 |
| 5 | \$31,950 | \$51,150 | \$76,680 |
| 6 | \$34,350 | \$54,950 | \$82,440 |
| 7 | \$36,700 | \$58,700 | \$88,080 |
| 8 | \$39,050 | \$62,500 | \$93,720 |

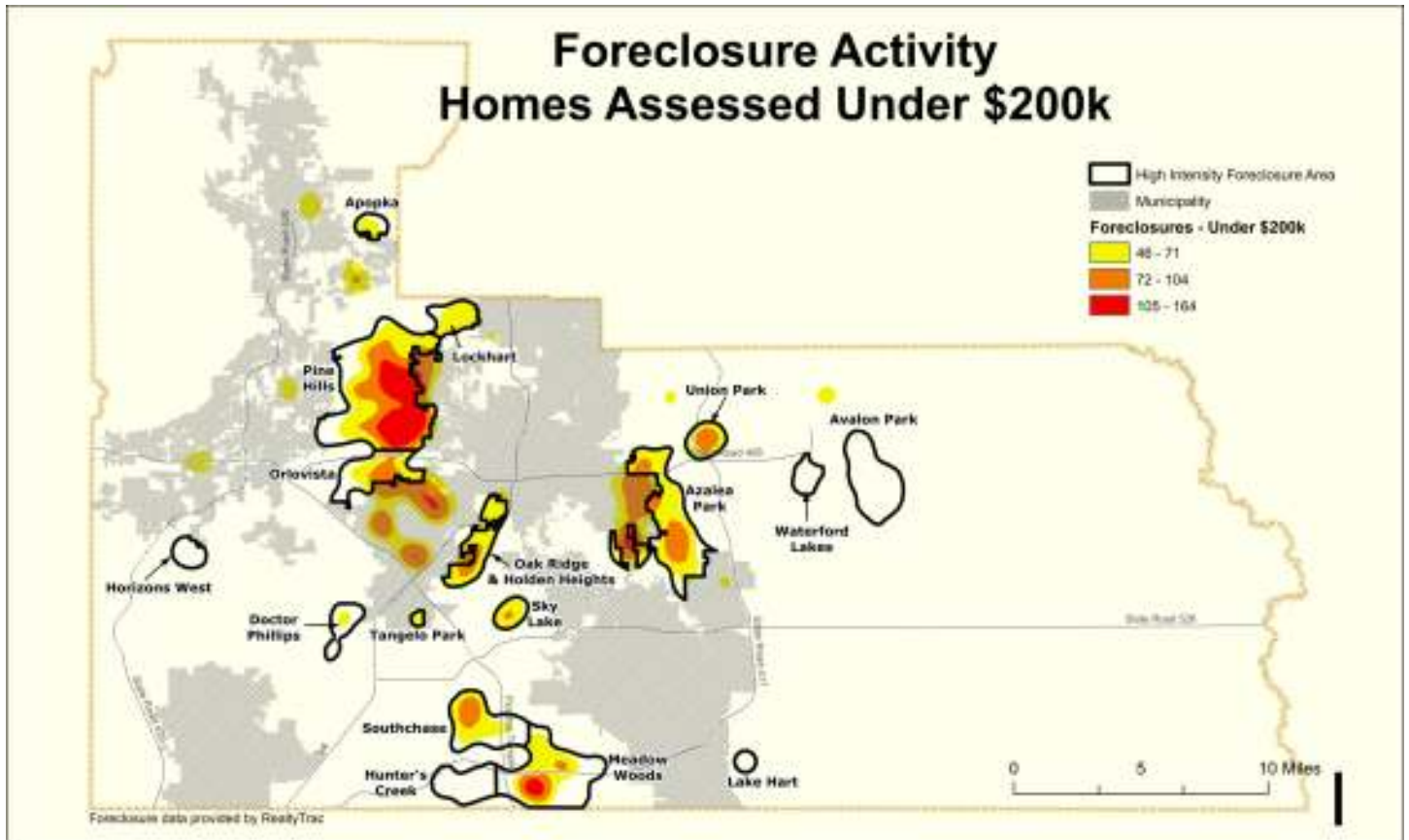
APPENDIX C

NEIGHBORHOOD STABILIZATION PROGRAM PERFORMANCE MEASURES

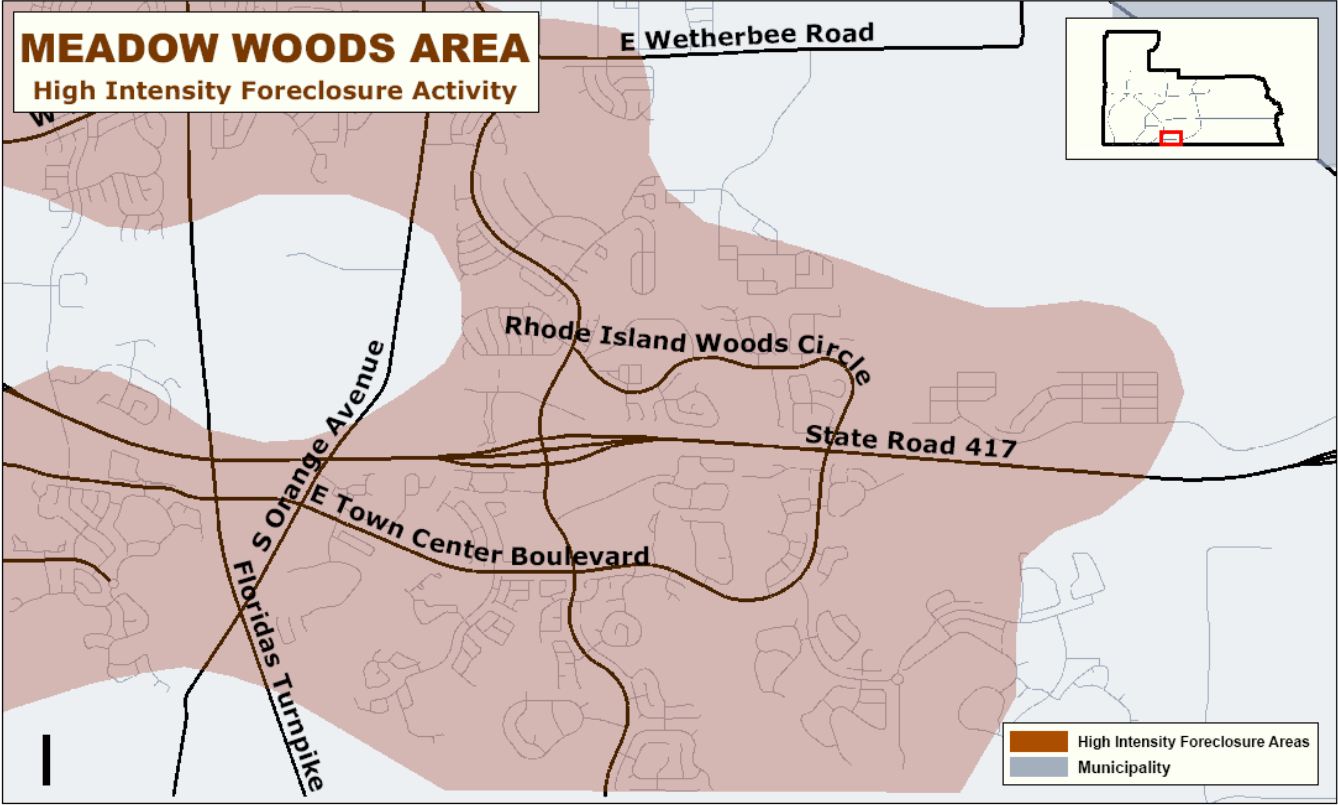
| Activity | Low-Income Units | Moderate Income Units | Middle Income Units | Total |
|-------------------------------------|-----------------------------|----------------------------------|--------------------------------|--------------|
| Single-Family Requisition/Rehab | 15 | 50 | 35 | 100 |
| Rental Housing Acquisition/Rehab | 80 | 20 | - | 100 |
| Demolition | 10 | 10 | 5 | 25 |
| Financing Mechanism | 15 | 50 | 35 | 100 |
| Reconstruction of Acquired | 5 | 5 | 0 | |
| Total | 125 | 135 | 75 | 335 |

APPENDIX D
GEOGRAPHIC AREAS

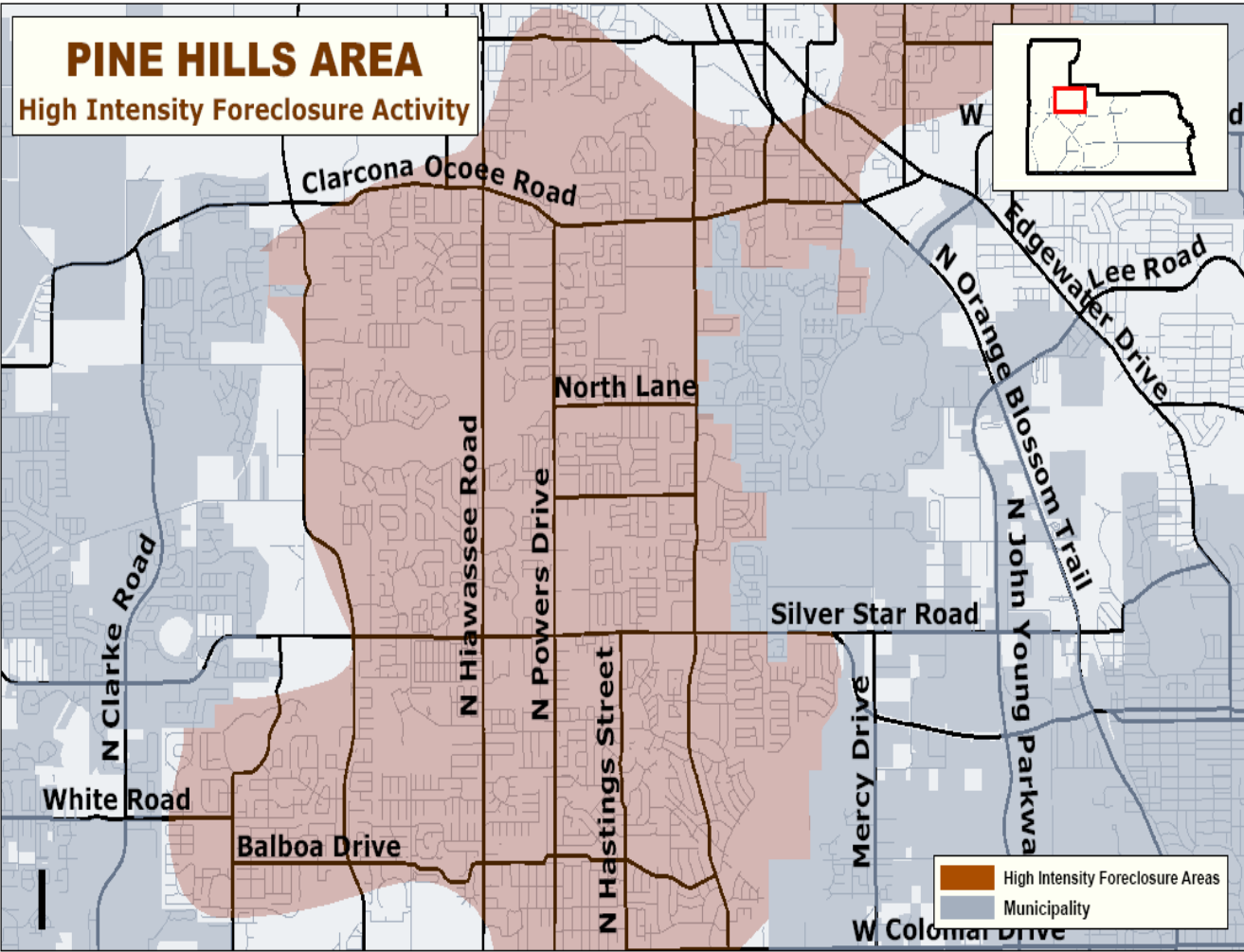
MAP 1
AREAS OF FORECLOSURE CONCENTRATIONS WITH HOME



MAP 2



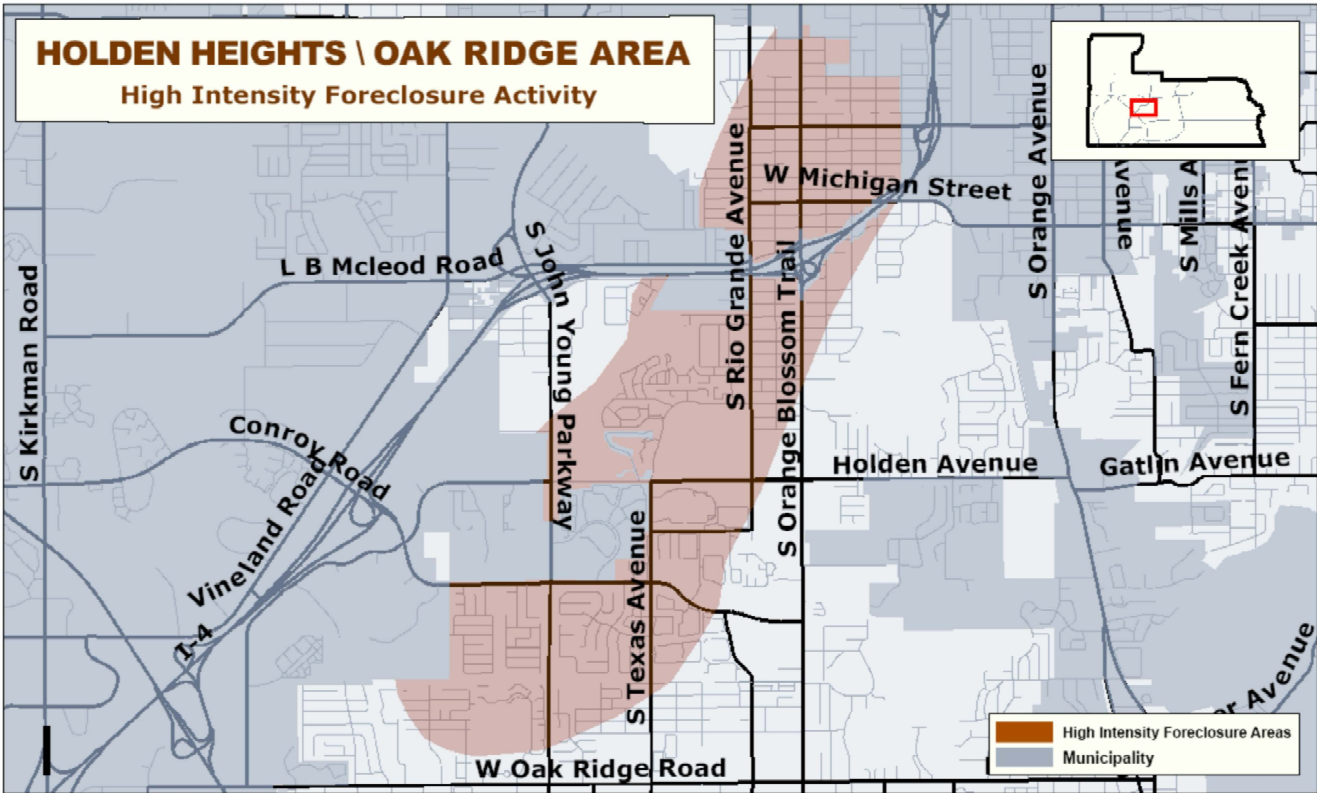
MAP 3



MAP 4



MAP 5



MAP 6



APPENDIX E

ORANGE COUNTY'S 2008-2009 ANNUAL ACTION PLAN AMENDMENT

Public Notice

The Orange County Housing and Community Development Division will receive an allocation of \$27.9 million under the Neighborhood Stabilization Program (NSP) which was approved under the 2008 Housing and Economic Recovery Act (HERA). The main purpose of the NSP is to stabilize neighborhoods that have been negatively impacted by foreclosed and abandoned properties. The NSP will allocate financial resources to mitigate neighborhood decline and provide opportunities for very low to moderate income families to achieve home ownership or secure affordable rental units. Orange County will implement the following activities utilizing NSP funds:

1. Acquisition, rehabilitation and disposition of foreclosed properties for homeownership activities;
2. Acquisition, rehabilitation and disposition of foreclosed properties for rental housing;
3. Demolition of blighted properties;
4. Redevelopment of demolished or vacant properties;
5. Financing mechanisms that may include one or more of the following incentives:
Down payment assistance; gap financing, and lease purchase.

Orange County will amend its 2008-2009 Action Plan to incorporate the NSP plan and expedite program implementation. The NSP plan will be available from November 4 through November 24, 2008 for public review and comment at the following locations and website:

Orange County Housing and Community Development Division

525 E. South Street, Orlando, FL 32801
(407) 836-5150
www.ocfl.net/housing

Orange County Public Library
Planning and Local Government Section
101 E. Central Ave., Orlando, FL 32801
(407) 835-7323

All comments regarding the Plan should be submitted to:

Frantz Dutes, Assistant Manager
Housing and Community Development Division
525 East South Street
Orlando, FL 32801
(407) 836-5191
Or email to: Frantz.Dutes@ocfl.net

Para información en Español, por favor llame a la Division de Vivienda y Desarrollo Comunitario al número 407-836-5191.

APPENDIX F- RESPONSE TO CITIZENS' COMMENTS

IV. APPLICATION FOR FEDERAL ASSISTANCE

| APPLICATION FOR FEDERAL ASSISTANCE | | Version 7/03 | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| 1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction | | 2. DATE SUBMITTED | Applicant Identifier |
| | | 3. DATE RECEIVED BY STATE | State Application Identifier |
| | | 4. DATE RECEIVED BY FEDERAL AGENCY | Federal Identifier |
| 5. APPLICANT INFORMATION | | | |
| Legal Name: | | Organizational Unit: | |
| Organizational DUNS: | | Department: | |
| Address: | | Division: | |
| Street: | | Name and telephone number of person to be contacted on matters involving this application (give area code) | |
| City: | | Prefix: | First Name: |
| County: | | Middle Name | |
| State: | | Last Name | |
| Zip Code | Suffix: | | |
| Country: | | Email: | |
| 6. EMPLOYER IDENTIFICATION NUMBER (EIN): □□-□□□□□□ | | Phone Number (give area code) | Fax Number (give area code) |
| 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) | | 7. TYPE OF APPLICANT: (See back of form for Application Types) Other (specify) | |
| 10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: □□-□□□ | | 9. NAME OF FEDERAL AGENCY: | |
| 12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): | | 11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: | |
| 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 | \$. | a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON | |
| b. Applicant | \$. | DATE: | |
| c. State | \$. | b. No. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372 | |
| d. Local | \$. | <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW | |
| e. Other | \$. | 17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? | |
| f. Program Income | \$. | <input type="checkbox"/> Yes If "Yes" attach an explanation. <input type="checkbox"/> No | |
| g. TOTAL | \$. | | |
| 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 | First Name | Middle Name | |
| Last Name | | Suffix | |
| b. Title | | c. Telephone Number (give area code) | |
| d. Signature of Authorized Representative | | e. Date Signed | |

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

v. 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 AMI.

(11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by

assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

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

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

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

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

Signature/Authorized Official

Date

Title