

## 1. NSP3 Grantee Information

NSP3 Program Administrator Contact Information	
Name (Last, First)	Romagnoli, George
Email Address	<a href="mailto:gromagnoli@pascocountyfl.net">gromagnoli@pascocountyfl.net</a>
Phone Number	727-834-3445 727-834-3450 (fax)
Mailing Address	Community Development Division 5640 Main Street #200 New Port Richey FL 34652

## 2. Areas of Greatest Need

### Map Submission

The map generated at the HUD NSP3 Mapping Tool for Preparing Action Plan website is included as an attachment.

### Data Sources Used to Determine Areas of Greatest Need

#### Describe the data sources used to determine the areas of greatest need.

Response:

The data source used was provided by the Department of Housing and Urban Development (HUD). HUD has given a score to every census tract in the country, with 20 being those most in need, and 1 being the least. Scoring was based on subprime loans between 2004-2007; the increase in the unemployment rate between March 2005 and March 2010 using the Bureau of Labor Standards Local Area Unemployment Statistics; the fall in home value using the Federal Housing Finance Agency Home Price Index; the number of foreclosure starts between January 2007 and March 2010; the number of foreclosure completions between January 2007 and June 2010; and the number of vacant homes using data from the U.S. Postal Service.

Additional data was obtained by the Clerk of the Circuit Court, the Federal Emergency Management Agency, and Multiple Listing Service.

### Determination of Areas of Greatest Need and Applicable Tiers

#### Describe how the areas of greatest need were established.

Response:

Pasco County looked at the information HUD developed through the NSP mapping tool. We limited our investigation to areas that scored "20", which HUD has determined is the areas of greatest need. We also looked at areas that were not located in the flood zone, which hampers rehabilitation efforts, and that has not seen as much activity from NSP 1 and NSP 2.

The area that was chosen we have named the Greater Elfers neighborhood. Elfers is one of the oldest areas in the western Pasco area.

There is no second area, so there is no tiering system.

## Housing Market Conditions

The Greater Elfers Neighborhood was first settled in 1870s, and is one of the oldest communities on the west coast of Florida. In 1913, a rail depot was established and the area began to flourish. The area was the central point for orange growers, and a packing house was established. From 1925-1933 the area was incorporated as the City of Elfers.

During World War II, men from across the United States were exposed to Florida because of the large number of training facilities and hospitals located in the Sunshine State. Many orange groves of acreage in west Pasco were converted to retirement communities. Greater Elfers was no different. Subdivisions such as Colonial Manor and Sunshine Park were developed in the 1960s, and Colonial Hills, Virginia City, and Holiday Garden Estates were developed in the 1970s.

These homes remained predominately senior in housing, but that began to change in the 1980s and 1990s. As Pinellas County to the south became unaffordable, young families began to migrate to Pasco County to live. More than half the working population of Greater Elfers leaves the County every day for employment.

During the housing boom of the 2000s, house prices increased 50-100%. When the bust occurred, hundreds of homes were foreclosed, and there are hundreds more in various stages of foreclosure now. Investors are swooping into the neighborhood and converting homes that were always inhabited by homeowners into rental property. While rental properties are important and necessary, too much rental in a single-family neighborhood can lead to an area that is destabilized by transient populations.

However, there are signs that the market has bottomed out and is beginning to stabilize. Greater Elfers, with a location closer to the work centers of Pinellas than other parts of Pasco, will see its home values stabilize earlier than other parts of Pasco.

## 3. Definitions and Descriptions

### Definitions

Term	Definition
Blighted Structure	Blighted structure means a deteriorated or deteriorating structure which endangers life or property by fire or other causes, unsanitary or unsafe condition(s) or deterioration of the site and its improvements, which condition(s) impair or arrest the sound growth of the county or are a menace to the public health, safety, morals or welfare.
Affordable Rents	Not applicable - Pasco County will not spend any of its NSP 3 funds for rental housing. The neighborhood being assisted by these funds has been targeted by investors who have made this neighborhood, which is predominately single-family, a rental community, destabilizing the neighborhood. NSP 1 and NSP 2 funds are paying for rental housing in other areas.

Vicinity Hiring Preference	<p>NSP 3 requires that a preference for vendors that are located in the target area for hiring. Pasco County will meet these requirements with the following actions:</p> <ol style="list-style-type: none"> <li>1) All contracts with vendors will strongly recommend the use of vicinity area vendors as subcontractors.</li> <li>2) Information sessions will be held with local vendors to notify them about NSP 3 hiring possibilities.</li> <li>3) Projects that meet Section 3 thresholds will be required to attempt to hire employees from the Target Area.</li> </ol>
Rental Housing Preference	<p>Not applicable - Pasco County will not spend any of its NSP 3 funds for rental housing. The neighborhood being assisted by these funds has been targeted by investors who have made this neighborhood, which is predominately single-family, a rental community, destabilizing the neighborhood. NSP 1 and NSP 2 funds are paying for rental housing in other areas.</p>

### Descriptions

Term	Definition
Long-Term Affordability	<p>To ensure affordability, all NSP 3 funds shall be recaptured. Additionally, Pasco County will at time of re-sale recapture the amount of equity that is not initially mortgaged by the lender and the County at the time of initial sale, if any funds are available.</p> <p>Pasco County will recapture all NSP funds. Those funds will be used for another NSP eligible project with an NSP eligible client. The affordability period will be 20 years, enforced by mortgage and note in favor of the County.</p> <p>Also to ensure affordability, an equity-capturing provision will be in place through a mortgage and note that will also prevent flipping of homes. Pasco County will recapture at time of re-sale or payoff the amount of equity that is not mortgaged by the lender loan and the County loan combined, and what the homebuyer puts into the purchase, at time of purchase. Appreciation is defined as the gain a homebuyer receives from the sale of the home, less any reasonable title and real estate costs. The cost of home improvements completed with building permits also shall be deducted from this amount. This equity capping may not be more than the cash available at closing.</p>
Housing Rehabilitation Standards	<p>All housing rehabilitated through the NSP 3 must meet the standards of the Pasco County Homebuyer Assistance Program Minimum Housing Standards Checklist (see attached). This exceeds the Section 8 guidelines and the Pasco County building code.</p> <p>All gut rehabilitation or new construction (i.e., general replacement of the interior of a building that may or may not include changes to structural elements such as flooring systems, columns or load bearing interior or exterior walls) of residential buildings up to three stories will be designed to meet the standard for Energy Star Qualified New Homes.</p>

	<p>All gut rehabilitation or new construction of mid -or high-rise multifamily housing will be designed to meet American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Standard 90.1-2004, Appendix G plus 20 percent (which is the Energy Star standard for multifamily buildings piloted by the Environmental Protection Agency and the Department of Energy).</p> <p>Other rehabilitation will meet these standards to the extent applicable to the rehabilitation work undertaken, e.g., replace older obsolete products and appliances (such as windows, doors, lighting, hot water heaters, furnaces, boilers, air conditioning units, refrigerators, clothes washers and dishwashers) with Energy Star-46 labeled products.</p> <p>Water efficient toilets, showers, and faucets, such as those with the WaterSense label, will be installed.</p> <p>The housing will be built to mitigate hurricanes, such as the installation of windows, doors and garage doors in wind mitigation zones that meet the State wind standards.</p>
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#### 4. Low-Income Targeting

##### Low-Income Set-Aside Amount

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

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

Response:

Total low-income set-aside **percentage** (must be no less than 25 percent): 25.00%

Total funds set aside for low-income individuals = \$1,296,444.50

##### Meeting Low-Income Target

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

Response:

Low Income buyers of homes will receive homeownership assistance equal to 50% of the sales price.

This assistance will be in the form of a 0% loan.

#### 5. Acquisition and Relocation

##### Demolition or Conversion of LMI Units

Does the grantee intend to demolish or convert any low- and moderate-income dwelling units (i.e., ≤ 80% of area median income)?	No
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If yes, fill in the table below.

Question	Number of Units
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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.	

## 6. Public Comment

### Citizen Participation Plan

<b>Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment or abbreviated plan.</b>
Response: This document was placed on the County website for 15 days prior to review and approval by the Board of County Commissioners. Any comments will be attached to this plan.

### Summary of Public Comments Received.

The summary of public comments received is included as an attachment.

## 7. NSP Information by Activity

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

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

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

Activity Number 1	
<b>Activity Name</b>	Pasco Opportunity Program
<b>Uses</b>	Select all that apply:
	<input type="checkbox"/> Eligible Use A: Financing Mechanisms
	X Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/> Eligible Use C: Land Banking
	<input type="checkbox"/> Eligible Use D: Demolition
<input type="checkbox"/> Eligible Use E: Redevelopment	
<b>CDBG Activity or</b>	24 CFR 570.201(a) Acquisition

<b>Activities</b>	24 CFR 570.201(b) Disposition 24 CFR 570.201(i) Relocation 24 CFR 570.201(n) Homeowner Assistance 24 CFR 570.202 Rehabilitation The activities listed above may include required homebuyer counseling as an activity delivery cost	
<b>National Objective</b>	Low Moderate Middle Income Housing (LMMH) Low Income Housing to meet 25% Set-Aside	
<b>Activity Description</b>	<p>Through not-for-profit agency developers, properties will be purchased, rehabilitated, and sold to eligible homebuyers. This will be the same activity that is being done with NSP 1 and NSP 2 Program.</p> <p>The agencies will find properties in the designated area. The properties will be inspected by County staff and a review will be conducted as to whether it is feasible for rehabilitation and financially feasible for acquisition.</p> <p>Once the property is acquired, County staff will assist the agency in rehabilitating the property. The agency will then sell the property to an eligible homebuyer, who will receive homeownership assistance from the County. Pasco County will lend to the agencies the NSP funds at an interest rate of 0% for 12 months, which can be renewed if the property is not completed and sold. When the property is sold, part of the debt will be assumed by the buyer, as their homeownership assistance. The buyer is responsible for finding a lender to finance the first mortgage. The house will be sold at a price less than what it cost for NSP to acquire and rehabilitate the property. The County assistance will eventually be re-paid to the County, and those funds will be used to produce other NSP 3 eligible projects, thus ensuring the continuance of affordable housing in the area.</p> <p>On all contracts, agencies and other vendors will be strongly counseled to use local vendors in the vicinity in subcontracts. Pasco County will conduct an outreach campaign to contact those vendors and inform them about the program. If bids are obtained and a local vicinity contractor has the same bid as non-vicinity contractor, the vicinity contractor will be awarded the contract.</p> <p>Taking foreclosed and abandoned homes, rehabilitating them, and putting homeowners in these vacant homes will stabilize the market conditions in the neighborhoods, by decreasing the amount of blighted homes available. Pasco County will not spend any of its NSP 3 funds for rental housing. The neighborhood being assisted by these funds has been targeted by investors who have made this neighborhood, which is predominately single-family, a rental community, destabilizing the neighborhood. NSP 1 and NSP 2 funds are paying for rental housing in other areas.</p>	
<b>Location Description</b>	As described above, the Greater Elfers Neighborhood will be the site of all Pasco Opportunity Program activities.	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$3,585,776
		\$0
<b>Total Budget for Activity</b>		<b>\$3,585,776</b>

<b>Performance Measures</b>	Number of homes acquired – 44 homes	
<b>Projected Start Date</b>	May 1, 2011	
<b>Projected End Date</b>	April 30, 2013	
<b>Responsible Organization</b>	<b>Name</b>	Pasco County
	<b>Location</b>	Community Development Division 5640 Main Street #200 New Port Richey FL 34652
	<b>Administrator Contact Info</b>	George Romagnoli

<b>Activity Number 2</b>	
<b>Activity Name</b>	Homebuyer Assistance Program
<b>Use</b>	Select all that apply:
	<input checked="" type="checkbox"/> Eligible Use A: Financing Mechanisms
	<input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/> Eligible Use C: Land Banking
	<input type="checkbox"/> Eligible Use D: Demolition
	<input type="checkbox"/> Eligible Use E: Redevelopment
<b>CDBG Activity or Activities</b>	24 CFR 570.201(a) Acquisition 24 CFR 570.201(b) Disposition 24 CFR 570.201(i) Relocation 24 CFR 570.201(n) Homeowner Assistance 24 CFR 570.202 Rehabilitation The activities listed above may include required homebuyer counseling as an activity delivery cost
<b>National Objective</b>	Low Moderate Middle Income Housing (LMMH) Low Income Housing to meet 25% Set-Aside
<b>Activity Description</b>	NSP 3 will provide homeownership and rehabilitation assistance to homebuyers purchasing eligible properties in the NSP 3 area. This will be the same activity that is being done with the NSP 1 and NSP 2 Program. The homebuyers will find properties in the area designated. The properties will be inspected by County staff and a review will be made as to whether it is feasible for rehabilitation and financially feasible for acquisition. The application for the homebuyer shall come through an approved lender. Once the property is acquired, County staff will assist the homebuyer in rehabilitating the property. Pasco County will lend to the homebuyer the NSP funds at an interest rate of 0%. Payments will either begin immediately or five years after purchase, depending on the homebuyer's ability to pay. The County assistance will eventually be re-paid to the County, and those funds will be used to produce other NSP 3 eligible projects, thus ensuring the continuance of affordable housing in the area. On all contracts, the homebuyers will be strongly counseled to use local vendors in the vicinity in subcontracts. Pasco County will conduct an outreach campaign to contact those vendors and inform them about the program. Taking foreclosed and abandoned homes, rehabilitating them, and putting homeowners in these vacant homes will stabilize the market conditions in the neighborhoods, by decreasing the amount of blighted homes available. Pasco County will not spend any of its NSP 3 funds for rental housing. The

	neighborhood being assisted by these funds has been targeted by investors who have made this neighborhood, which is predominately single-family, a rental community, destabilizing the neighborhood. NSP 1 and NSP 2 funds are paying for rental housing in other areas.	
<b>Location Description</b>	As described above, the Greater Elfers Neighborhood will be the site of all Homebuyer Assistance Program activities.	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$500,000
		\$0
		\$0
<b>Total Budget for Activity</b>	<b>\$500,000</b>	
<b>Performance Measures</b>	Number of homes acquired : 10	
<b>Projected Start Date</b>	May 1, 2011	
<b>Projected End Date</b>	April 30, 2013	
<b>Responsible Organization</b>	<b>Name</b>	Pasco County
	<b>Location</b>	Community Development Division 5640 Main Street #200 New Port Richey FL 34652
	<b>Administrator Contact Info</b>	George Romagnoli

<b>Activity Number 3</b>	
<b>Activity Name</b>	Demolition
<b>Use</b>	Select all that apply: <input type="checkbox"/> Eligible Use A: Financing Mechanisms <input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation <input type="checkbox"/> Eligible Use C: Land Banking <input checked="" type="checkbox"/> Eligible Use D: Demolition <input type="checkbox"/> Eligible Use E: Redevelopment
<b>CDBG Activity or Activities</b>	570.201(d) Clearance
<b>National Objective</b>	Low Moderate Middle Income Area (LMMA) Serves an area in which at least 51 percent of the residents have incomes at or below 120 percent of area median income (LMMA)
<b>Activity Description</b>	<p>Pasco County will demolish structures that meet the definition of "blighted" as described above. The property that is demolished will have a lien placed on the property. If the lien is not paid-back by the property owner, the County will foreclose on the lien and a new home will be built on the site.</p> <p>On all contracts, Pasco County will endeavor to use local vendors in the vicinity. Pasco County will conduct an outreach campaign to contact those vendors and inform them about the program. If bids are obtained and a local vicinity contractor has the same bid as non-vicinity contractor, the vicinity contractor will be awarded the contract.</p> <p>Demolishing these buildings will remove eyesores from the neighborhood and improve the market conditions of the existing buildings in the area.</p> <p>Pasco County will not spend any of its NSP 3 funds for rental housing. The neighborhood being assisted by these funds has been targeted by investors who have made this neighborhood, which is predominately single-family, a</p>



	rental community, destabilizing the neighborhood. NSP 1 and NSP 2 funds are paying for rental housing in other areas.	
<b>Location Description</b>	As described above, the Greater Elfers Neighborhood will be the site of all Demolition activities.	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$200,000
		\$0
		\$0
<b>Total Budget for Activity</b>	\$200,000	
<b>Performance Measures</b>	Number of buildings demolished - 20	
<b>Projected Start Date</b>	May 1, 2011	
<b>Projected End Date</b>	April 30, 2013	
<b>Responsible Organization</b>	<b>Name</b>	Pasco County
	<b>Location</b>	Community Development Division 5640 Main Street #200 New Port Richey FL 34652
	<b>Administrator Contact Info</b>	George Romagnoli

<b>Activity Number 4</b>	
<b>Activity Name</b>	New Construction Program
<b>Use</b>	Select all that apply:
	<input type="checkbox"/> Eligible Use A: Financing Mechanisms
	<input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/> Eligible Use C: Land Banking
	<input type="checkbox"/> Eligible Use D: Demolition
<input checked="" type="checkbox"/> Eligible Use E: Redevelopment	
<b>CDBG Activity or Activities</b>	570.201 (a) Acquisition 570.201 (b) Disposition 570.201 (c) Public facilities and improvements 570.201 (e) Public services for housing counseling, but only to the extent that counseling beneficiaries are limited to prospective purchasers or tenants of the redeveloped properties 570.201 (i) Relocation 570.201 (n) Direct homeownership assistance (as modified below). 24 CFR 570.202 Eligible rehabilitation and preservation activities for demolished or vacant properties. 24 CFR 570.204 Community based development organizations. HUD notes that any of the activities listed above may include required homebuyer counseling as an activity delivery cost. New construction of housing is eligible as part of the redevelopment of demolished or vacant properties.
<b>National Objective</b>	Low Moderate Middle Income Housing (LMMH) Low Income Housing to meet 25% Set-Aside
<b>Activity Description</b>	Pasco County will finance the construction of new homes in established

	<p>subdivisions by not-for-profit developers. The agencies will find properties in the area designated. They will be inspected by County staff and a review will be made as to whether it is feasible for construction and financially feasible for acquisition. Once the property is acquired, the not-for-profit developers will seek a builder that will construct a home to County standards (or, will build the home itself if it is a self-help housing agency, such as Habitat for Humanity). The County will work with the not-for-profit developer and the builder to make sure the home is built correctly. The agency will then sell the property to an eligible homebuyer, who will receive homeownership assistance from the County. Pasco County will lend to the agencies the NSP funds at an interest rate of 0% for 12 months, which can be renewed if the property is not completed and sold. When the property is sold, part of the debt will be assumed by the buyer which will be their assistance from the County in the purchase of the home. The buyer is responsible for finding a lender to finance the first mortgage. The house will be sold at a price less than what it cost for NSP to acquire and rehabilitate the property. For self-help agencies, the County may finance the entire amount. The County assistance will eventually be re-paid to the County, and those funds will be used to produce other NSP 3 eligible projects, thus ensuring the continuance of affordable housing in the area. On all contracts, agencies and other vendors will be strongly counseled to use local vendors in the vicinity in subcontracts. Pasco County will conduct an outreach campaign to contact those vendors and inform them about the program. If bids are obtained and a local vicinity contractor has the same bid as non-vicinity contractor, the vicinity contractor will be awarded the contract. Taking vacant property eyesores and building new homes on those sites, will stabilize the market conditions in the neighborhoods, by decreasing these vacant blighted properties that destabilize neighborhoods by making those neighborhoods unattractive. Pasco County will not spend any of its NSP 3 funds for rental housing. The neighborhood being assisted by these funds has been targeted by investors who have made this neighborhood, which is predominately single-family, a rental community, destabilizing the neighborhood. NSP 1 and NSP 2 funds are paying for rental housing in other areas.</p>	
<b>Location Description</b>	As described above, the Greater Elfers Neighborhood will be the site of all New Construction Program activities.	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$400,000
		\$0
<b>Total Budget for Activity</b>		\$400,000
<b>Performance Measures</b>	Number of homes built : 4	
<b>Projected Start Date</b>	May 1, 2011	
<b>Projected End Date</b>	April 30, 2013	
<b>Responsible</b>	<b>Name</b>	Pasco County

<b>Organization</b>	<b>Location</b>	Community Development Division 5640 Main Street #200 New Port Richey FL 34652
	<b>Administrator Contact Info</b>	George Romagnoli

Activity Number 5		
<b>Activity Name</b>	Administration	
<b>Use</b>	Select all that apply:	
	<input type="checkbox"/>	Eligible Use A: Financing Mechanisms
	<input type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/>	Eligible Use C: Land Banking
	<input type="checkbox"/>	Eligible Use D: Demolition
<input type="checkbox"/>	Eligible Use E: Redevelopment	
<b>CDBG Activity or Activities</b>	N/A	
<b>National Objective</b>	N/A	
<b>Activity Description</b>	Administration of the NSP 3 Program	
<b>Location Description</b>	N/A	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$500,000
		\$0
		\$0
<b>Total Budget for Activity</b>	\$500,000	
<b>Performance Measures</b>	N/A	
<b>Projected Start Date</b>	May 1, 2011	
<b>Projected End Date</b>	April 30, 2013	
<b>Responsible Organization</b>	<b>Name</b>	Pasco County
	<b>Location</b>	Community Development Division 5640 Main Street #200 New Port Richey FL 34652
	<b>Administrator Contact Info</b>	George Romagnoli

## 8. Certifications

### Certifications for State and Entitlement Communities

(1) **Affirmatively furthering fair housing.** The jurisdiction certifies that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.

(2) **Anti-displacement and relocation plan.** The applicant certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.

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

(4) **Authority of jurisdiction.** The jurisdiction certifies that the consolidated plan or abbreviated plan, as applicable, is authorized under state and local law (as applicable) and that the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.

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

(6) **Acquisition and relocation.** The jurisdiction certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the notice for the NSP program published by HUD.

(7) **Section 3.** The jurisdiction certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.

(8) **Citizen participation.** The jurisdiction certifies that it is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.

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

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

(11) **The jurisdiction certifies:**

- a. that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income; and
- b. The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

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

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

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

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

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

(17) **Development of affordable rental housing.** The jurisdiction certifies that it will abide by the procedures described in its NSP3 Abbreviated Plan to create preferences for the development of affordable rental housing for properties assisted with NSP3 funds (Note – Pasco County will not spend any of its NSP 3 funds for rental housing. The neighborhood being assisted by these funds has been targeted by investors who have made this neighborhood, which is predominately single-family, and rental community, destabilizing the neighborhood. NSP 1 and NSP 3 funds are paying for rental housing in other areas).

\_\_\_\_\_  
Ann Hildebrand

\_\_\_\_\_  
Date

\_\_\_\_\_  
Chairman, Board of County Commissioners



## Appendix: NSP3 Action Plan Contents Checklist

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

### 1. NSP3 Grantee Information

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

### 2. Areas of Greatest Need

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

### 3. Definitions and Descriptions

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

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

#### 4. Low-Income Targeting

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

#### 5. Acquisition & Relocation

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

#### 6. Public Comment

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

#### 7. NSP Information by Activity

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



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

## 8. Certifications

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

## 9. Additional Documentation

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

## Appendix

### HUD Mapping Tool Document

#### NSP3 Score

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

Neighborhood NSP3 Score: 20

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 3551

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 82.73

Percent Persons Less than 80% AMI: 59.53

#### Neighborhood Attributes (Estimates)

##### *Vacancy Estimate*

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem. The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified. In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 3552

Residential Addresses Vacant 90 or more days (USPS, March 2010): 157

Residential Addresses NoStat (USPS, March 2010): 20

##### *Foreclosure Estimates*

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious

delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 1665

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 39.88

Percent of Housing Units 90 or more days delinquent or in foreclosure: 19.83

Number of Foreclosure Starts in past year: 204

Number of Housing Units Real Estate Owned July 2009 to June 2010: 61

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

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 40

#### Supporting Data

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

Place (if place over 20,000) or county unemployment rate June 2005\*: 4.2

Place (if place over 20,000) or county unemployment rate June 2010\*: 12.8

\*Bureau of Labor Statistics Local Area Unemployment Statistics

This data shows that this is an area with high foreclosures, a large amount of subprime loans. For all data that was obtained for NSP 1, 2 and 3, this area has continued to show that it is a high area of need and will continue unless concentrated attention is implemented.

#### Latitude and Longitude of corner points

-82.739582 28.209802 -82.737393 28.216987 -82.733788 28.224437 -82.723060 28.224437 -82.723360  
28.231621 -82.715249 28.231696 -82.715335 28.228331 -82.709584 28.228369 -82.709584 28.224437  
-82.707095 28.224437 -82.707138 28.217063 -82.722974 28.216949 -82.723532 28.209878

#### Blocks Comprising Target Neighborhood

121010307001000, 121010307001004, 121010307001005, 121010307001003, 121010307001001,  
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