



### State of Ohio Neighborhood Stabilization Program 3 FY 2010 Ohio Consolidated Plan Substantial Amendment

1. NSP3 Grantee Information

NSP3 Program Administrator Contact Information	
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2. Areas of Greatest Need

**Map Submission**

A map generated at the HUD NSP3 Mapping Tool for Preparing Action Plan website is NOT included as an attachment. To do so would require the State of Ohio to map 754 Census sites, which would be an onerous and unwieldy task. However, included in this Substantial Amendment is a list of the eligible Census tracts (see answer 7) and a statewide map (see Attachment 1) of those tracts. In addition, upon request, Ohio can provide an ESRI Shapefile of the boundaries of the tracts. After the public comment period, the Affordable Rental Housing Initiative Notice of Funding Availability and guidelines (see Attachment 2) will be distributed to invite eligible applicants to apply for NSP 3 funds. The State of Ohio will submit an amendment on or before June 30, 2011, which will include the needs and target area mapping data for Ohio's selected NSP 3 projects. Ohio will continue to seek alternative sources to fund these projects in order to make the best possible use of NSP 3 funds; therefore, subsequently, the number of NSP 3 projects submitted in June 30, 2011 may be decreased. If so, a revised amendment will be submitted.

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

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

Ohio used the data posted on the U.S. Department of Housing and Urban Development's Foreclosure Need website to determine the areas of greatest need.

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

**Describe how the areas of greatest need were established and whether a tiered approach is being utilized to determine the distribution of funding.**

According to the U.S. Department of Housing and Urban Development, the minimum needs score in Ohio is a "17." To target the limited funds to the neediest areas, Ohio further limited the program's eligible projects to those projects located in 754 Census tracts in Ohio scoring an "18" or higher (see answer 7), which includes both rural and urban areas. The distribution of funds in this manner is consistent with meeting the housing needs of Ohio's lower income residents, as outlined in the *FY 2010-2014 Ohio Consolidated Plan Needs Assessment Strategy*; and the priority of preserving rental housing, as included in the Housing Performance Measures Section of the *FY 2010 Ohio Consolidated Plan*. For example, of the 240,000 Ohio renter households in the 30-50 percent median income range, about 62 percent report a housing problem, with 59 percent having a cost burden. As a result, the State of Ohio's number one objective for housing performance is preserving affordable renter housing for lower income households.

3. Definitions and Descriptions

Definitions

Term	Definition
Blighted Structure	<p>Ohio Revised Code Section 1.08 (blighted Area Defined – Excluded Consideration) defines blighted area/parcel/structure as follows:</p> <p>(A) “Blighted area” and “slum” mean an area in which a least seventy percent of the parcels are blighted parcels and those parcels substantially impair or arrest the sound growth of the state or a political subdivisions of the state, retard the provision of housing accommodations, constitute an economic or social liability, or are a menace to the public health, safety, morals or welfare in their present condition and use.</p> <p>(B) “Blighted parcel” means either of the following:</p> <p>(1) A parcel that has one or more of the following conditions:</p> <ul style="list-style-type: none"> <li>(a) A structure that is dilapidated, unsanitary, unsafe, or vermin infested and that because of its condition has been designated by an agency that is responsible for the enforcement of housing, building, or fire codes as unfit for human habitation or use*;</li> <li>(b) The property poses a direct threat to public health or safety in its present condition by reason of environmentally hazardous conditions, solid waste pollution or contamination; and</li> <li>(c) Tax or special assessment delinquencies exceeding the fair value of the land that remains unpaid 35 days after notice to pay has been mailed.</li> </ul> <p style="padding-left: 40px;">*In jurisdictions without an agency that is responsible for the enforcement of housing, building or fire codes, “blighted” as defined above must be determined by a qualified rehabilitation specialist or local code enforcement officer.</p> <p>(2) A parcel that has two or more of the following conditions that, collectively considered, adversely affect surrounding or community property values or entail land use relationships that cannot reasonably be corrected through existing zoning codes or other land use regulations:</p> <ul style="list-style-type: none"> <li>(a) Dilapidation and deterioration;</li> <li>(b) Age and obsolescence;</li> <li>(c) Inadequate provision for ventilation, light, air, sanitation, or open spaces;</li> <li>(d) Unsafe and unsanitary conditions;</li> <li>(e) Hazards that endanger lives or properties by fire or other causes;</li> <li>(f) Noncompliance with building, housing, or other codes;</li> <li>(g) Nonworking or disconnected utilities;</li> <li>(h) Is vacant or contains an abandoned structure;</li> <li>(i) Excessive dwelling unit density;</li> <li>(j) Is located in an area of defective or inadequate street layout;</li> <li>(k) Overcrowding of buildings on the land;</li> <li>(l) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness;</li> <li>(m) Vermin infestation;</li> <li>(n) Extensive damage or destruction caused by a major disaster when the damage has not been remediated within a reasonable time;</li> <li>(o) Identified hazards to health and safety that are conducive to ill health, transmission of disease, juvenile delinquency, or crime; and</li> </ul>

	<p>(p) Ownership or multiple ownership of a single parcel when the owner, or a majority of the owners of a parcel in the case of multiple ownership, cannot be located.</p> <p>(C) When determining whether a property is a blighted parcel or whether an area is a blighted area or slum for the purposes of this section, no person shall consider whether there is a comparatively better use for any premises, property, structure, area or portion of an area or whether the property could generate more tax revenues if put to another use.</p> <p>(D) Notwithstanding any other provision of this section, absent any environmental or public health hazard that cannot be corrected under its current use or ownership, a property is not a blighted parcel because of any condition listed in division (B) of this section if the condition is consistent with conditions that are normally incident to generally accepted agricultural practices and the land is used for agricultural purposes as defined in section 303.01 or 519.01 of the Revised Code, or the that the land is "land devoted exclusively to agricultural use" as defined in section 5713.30 of the Revised Code.</p> <p>A property that under division (D)(1) of this section is not a blighted parcel shall not be included in a blighted area or slum.</p>
Affordable Rents	NSP 3-assisted rental units must be affordable to households with incomes at or below 50 percent of the area median income, adjusted for family size and county. Owners must calculate affordable rents using the definition of affordable rents for the Low-Income Housing Tax Credit (LIHTC) Program (Section 42(f) of the Internal Revenue Code).

#### Descriptions

Term	Definition
Long-Term Affordability	<p>The Ohio Department of Development will award 100 percent of the project dollars to the Ohio Housing Finance Agency for distribution through the Affordable Rental Housing Initiative (see Attachment 2). To be eligible to receive the initiative funds, applicants must propose to redevelop or rehabilitate demolished, foreclosed, abandoned or vacant residential properties that serve households with incomes at or below 50 percent of the area median income. The Ohio Department of Development and Ohio Housing Finance Agency will enforce the minimum continued affordability requirements defined by the HOME Investment Partnerships Program final rule (24 CFR 92.252) for the Ohio NSP-funded residential development projects.</p> <p>Projects receiving rental assistance will have a minimum of a 20-year-affordability period. An exception will be provided for projects involving the sale of the units to eligible residents after the 15<sup>th</sup> year in the compliance period. Rental and income restrictions will be enforced through a restrictive covenant land use agreement. Existing procedures in place for the Low Income Housing Tax Credit Program and Housing Development Assistance Program to monitor compliance with the restrictions will be implemented, including annual certification reports from the owners; and routine, on-site file and physical inspections by qualified staff.</p>
Housing Rehabilitation Standards	Ohio NSP 3 award recipients must comply with the <b><i>Housing Handbook Part II – 2008 Residential Rehabilitation Standards</i></b> , which is posted on <a href="http://development.ohio.gov/community/ohcp/publications.htm">http://development.ohio.gov/community/ohcp/publications.htm</a> . In addition, for housing rehabilitation of pre-1978 structures, Ohio NSP award recipients must comply with applicable state and federal laws, rules and regulations governing the testing and treatment of lead-based paint, including disclosures to residents/buyers; and the Ohio Department of Development lead-based paint policy included in the <b><i>FY 2010 Ohio Consolidated Plan</i></b> , which is also posted

on <http://development.ohio.gov/community/ohcp/publications.htm>. Projects will be required to meet the property standards (24 CFR 92.251) and rental housing qualification standard (24 CFR 92.252) for the HOME Investment Partnerships Program.

For projects involving **new construction**:

- Site and Neighborhood Standards – 24 CFR 983.6b
- State and Local Code Requirements. If no state and local codes apply, the project must use a nationally recognized model code.
- Model Energy Code.
- Handicapped Accessibility Requirements.

For projects involving **rehabilitation**:

- State and Local Code Requirements. If no state and local codes apply, the project must use the Ohio Department of Development Residential Rehabilitation Standards.
- Handicapped Accessibility Requirements.

For projects involving **redevelopment**:

- State and Local Code Requirements. If no state and local codes apply, the project must use a nationally recognized model code.
- Handicapped Accessibility Requirements.
- Ohio Department of Development Residential Rehabilitation Standards.

Also, all gut rehabilitation or new (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 must be designed to meet the standard for Energy Star Qualified New Homes; all gut rehabilitation or new construction of mid- or high-rise multifamily housing must 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 building piloted by the Environmental Protection Agency and the Department of Energy); other rehabilitation must 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; water efficient toilets, showers and faucets, such as those with the WaterSense label, must be installed; and where relevant, the housing should be improved to mitigate the impact of disasters (e.g., earthquake, hurricane, flooding, fires). Additionally, projects must meet the Enterprise Green Communities standards or other recognized energy conservation standards and which achieve the highest energy efficiency ratings.

**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.**

Total low-income set-aside **percentage** (must be no less than 25 percent): 100% of project dollars  
 Total funds set aside for low-income individuals = \$11,795,818, including administration

**Meeting Low-Income Target**

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

The Ohio Department of Development will award 100 percent of the project dollars to the Ohio Housing Finance Agency for distribution through the Affordable Rental Housing Initiative. To be eligible to receive the initiative funds, applicants must propose to redevelop or rehabilitate demolished, foreclosed, abandoned or vacant residential properties that serve households with incomes at or below 50 percent of the area median income.

**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)?	Yes – However, no occupied units will be demolished or converted.
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If yes, fill in the table below.

<b>Question</b>	<b>Number of Units</b>
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.	30*
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).	0
The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.	30

\*This is an estimate based on the state's experience developing rental units with NSP 1 funds. In that round, 20% of the units were newly constructed and some involved the demolition of existing structures on the sites. The state anticipates funding 150 units with NSP 3 funds, so the estimated number of newly constructed units is 30 (150 \* 20%). All units developed with NSP 3 funds will be set-aside for households whose income does not exceed 50 percent of area median income.

**6. Public Comment**

**Citizen Participation Plan**

**Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment or abbreviated plan.**

On November 22, 2010, the Ohio Department of Development distributed a memorandum to 1,100 award recipients and their affiliates requesting input regarding the expenditure of Ohio's NSP 3 allocation. The comments were considered during the drafting of the FY 2010 Ohio Consolidated Plan Substantial Amendment. The deadline for submitting input was December 15, 2010. Attachment 3 includes a summary of the comments received.

On February 2, 2011, the Ohio Department of Development posted the FY 2010 Ohio Consolidated Plan Substantial Amendment on the Internet and distributed a memorandum to 1,100 award recipients and their affiliates requesting comments on the draft Substantial Amendment. The comment period was February 3-18, 2011. Attachment 4 includes a summary of the comments received.

**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.

<b>Activity Number 1</b>	
<b>Activity Name</b>	Affordable Rental Housing Initiative
<b>Uses</b>	Select all that apply:
	<input type="checkbox"/> Eligible Use A: Financing Mechanisms
	<input checked="" type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/> Eligible Use C: Land Banking
	<input type="checkbox"/> Eligible Use D: Demolition
<input checked="" type="checkbox"/> Eligible Use E: Redevelopment	
<b>CDBG Activity or Activities</b>	As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206  24 CFR 570.201 – (a) Acquisition; (b) Disposition;(c) public facilities and improvements; (d) Clearance and remediation activities; (e) public services for housing counseling, but only to the extent that counseling beneficiaries are limited to tenants of the redeveloped properties; (i) Relocation  24 CFR 570.202 – Rehabilitation/Preservation  24 CFR 570.204 – Community-based development organizations
<b>National Objective</b>	Meets the national objective of benefiting low-income persons at or below 50 percent area median income.
<b>Activity Description</b>	The purpose of this activity is to encourage for-profit development entities, nonprofit organizations [i.e., 501(c)(3)] and public housing authorities to redevelop or rehabilitate demolished, foreclosed, abandoned or vacant residential properties that serve households with incomes at or below 50 percent of the area median income. In addition, the proposed projects must be located in a target census tract listed in this document as Ohio’s areas of greatest need. Applicants must demonstrate that a proposed project contributes to an existing community redevelopment plan or is consistent with the goals of the community’s Consolidated Plan. If no plan exists, the applicants must demonstrate local government support and explain why the proposed project is needed and will be sustainable during the compliance period. The NSP 3 funds may be awarded to fund projects: in conjunction with Low-Income Housing Tax Credit (LIHTC) Program, Housing Development Gap Financing (HDGF) Program and Multifamily Housing Bond and Bond Credit

	<p>the HDGF program requirements. Standard funding terms will be grants or loans with an interest rate of two percent and repayments based on available cash flow. An exception will be provided for projects involving the sale of the units to eligible residents after the 15<sup>th</sup> year in the affordability period. Rent and occupancy restrictions apply to all units in the project. "Rent" and "income" must be calculated based on the LIHTC Program rules. The rent and occupancy restrictions must be maintained for a minimum of 20 years.</p> <p>To ensure continued affordability, each project's deed will include a restrictive covenant, each project sponsor will be required to certify that the project will be affordable to households with incomes at or below 50 percent of the area median income and the income of the projects' residents will be monitored annually for compliance.</p> <p>Award recipients will be required to comply with the Section 3 regulations at 24 CFR 135 and, to the maximum extent feasible, provide for the hiring of employees who reside in the vicinity, as defined by the U.S. Department of Housing and Urban Development Secretary, of projects funded under this section or contract with small businesses that are owned and operated by persons residing in the vicinity of such projects. The NSP 3 grant agreements will include such a provision.</p>																																																																												
<p><b>Location Description</b></p>	<table border="1"> <thead> <tr> <th data-bbox="545 768 860 808">Ohio County</th> <th data-bbox="860 768 1508 808">TractGeoString</th> </tr> </thead> <tbody> <tr><td>Adams County</td><td>39001990100</td></tr> <tr><td>Adams County</td><td>39001990600</td></tr> <tr><td>Allen County</td><td>39003012200</td></tr> <tr><td>Allen County</td><td>39003012300</td></tr> <tr><td>Allen County</td><td>39003012500</td></tr> <tr><td>Allen County</td><td>39003012700</td></tr> <tr><td>Allen County</td><td>39003012800</td></tr> <tr><td>Allen County</td><td>39003012900</td></tr> <tr><td>Allen County</td><td>39003013000</td></tr> <tr><td>Allen County</td><td>39003013300</td></tr> <tr><td>Allen County</td><td>39003013400</td></tr> <tr><td>Allen County</td><td>39003013600</td></tr> <tr><td>Allen County</td><td>39003013700</td></tr> <tr><td>Allen County</td><td>39003013800</td></tr> <tr><td>Ashtabula County</td><td>39007000102</td></tr> <tr><td>Ashtabula County</td><td>39007000103</td></tr> <tr><td>Ashtabula County</td><td>39007000500</td></tr> <tr><td>Ashtabula County</td><td>39007000601</td></tr> <tr><td>Ashtabula County</td><td>39007000701</td></tr> <tr><td>Ashtabula County</td><td>39007000703</td></tr> <tr><td>Ashtabula County</td><td>39007001200</td></tr> <tr><td>Athens County</td><td>39009972600</td></tr> <tr><td>Athens County</td><td>39009973103</td></tr> <tr><td>Butler County</td><td>39017000300</td></tr> <tr><td>Butler County</td><td>39017000400</td></tr> <tr><td>Butler County</td><td>39017000600</td></tr> <tr><td>Butler County</td><td>39017000800</td></tr> <tr><td>Butler County</td><td>39017000900</td></tr> <tr><td>Butler County</td><td>39017001100</td></tr> <tr><td>Butler County</td><td>39017010500</td></tr> <tr><td>Butler County</td><td>39017012200</td></tr> <tr><td>Butler County</td><td>39017012300</td></tr> <tr><td>Butler County</td><td>39017012800</td></tr> <tr><td>Butler County</td><td>39017013900</td></tr> <tr><td>Butler County</td><td>39017014000</td></tr> <tr><td>Butler County</td><td>39017014100</td></tr> <tr><td>Carroll County</td><td>39019720100</td></tr> </tbody> </table>	Ohio County	TractGeoString	Adams County	39001990100	Adams County	39001990600	Allen County	39003012200	Allen County	39003012300	Allen County	39003012500	Allen County	39003012700	Allen County	39003012800	Allen County	39003012900	Allen County	39003013000	Allen County	39003013300	Allen County	39003013400	Allen County	39003013600	Allen County	39003013700	Allen County	39003013800	Ashtabula County	39007000102	Ashtabula County	39007000103	Ashtabula County	39007000500	Ashtabula County	39007000601	Ashtabula County	39007000701	Ashtabula County	39007000703	Ashtabula County	39007001200	Athens County	39009972600	Athens County	39009973103	Butler County	39017000300	Butler County	39017000400	Butler County	39017000600	Butler County	39017000800	Butler County	39017000900	Butler County	39017001100	Butler County	39017010500	Butler County	39017012200	Butler County	39017012300	Butler County	39017012800	Butler County	39017013900	Butler County	39017014000	Butler County	39017014100	Carroll County	39019720100
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	Wayne County	39169000400
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	Williams County	39171950300
	Wood County	39173022200
	Wood County	39173022300
	Wood County	39173022400
	*The TractGeoString is of the form SSCCTTTTTT where SS=State (39 for Ohio); CCC=County FIPS; and TTTTTT=Census Tract. The final two digits of the tract code are implied decimals.	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$11,795,818
	(Other funding source)	\$
	(Other funding source)	\$
<b>Total Budget for Activity</b>		<b>\$11,795,818</b>
<b>Performance Measures</b>	At least five Affordable Rental Housing Initiative projects, consisting of approximately 150 rental units, will be assisted with Ohio NSP 3 funds.	
<b>Projected Start Date</b>	July 1, 2011	
<b>Projected End Date</b>	December 31, 2012	
<b>Responsible Organization</b>	<b>Name</b>	Ohio Housing Finance Agency
	<b>Location</b>	57 East Main Street Columbus, Ohio 43215
	<b>Administrator Contact Info</b>	Sean Thomas, Director, Office of Planning, Preservation & Development Ohio Housing Finance Agency 57 East Main Street Columbus, Ohio 43215 (614) 644-5772

## 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.

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

JANUARY 26, 2011  
Date

INTERIM CHIEF LEGAL COUNSEL  
Title

**Application for Federal Assistance SF-424**

Version 02

\*1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

\*2. Type of Application

- New
- Continuation
- Revision

\* If Revision, select appropriate letter(s)

\*Other (Specify)  
\_\_\_\_\_

3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

39

\*5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\*a. Legal Name: State of Ohio

\*b. Employer/Taxpayer Identification Number (EIN/TIN):

\*c. Organizational DUNS:

**d. Address:**

\*Street 1: 77 South High Street, 24<sup>th</sup> Floor  
Street 2: P.O. Box 1001  
\*City: Columbus  
County: Franklin  
\*State: Ohio  
Province: \_\_\_\_\_  
\*Country: USA  
\*Zip / Postal Code 43216-1001

**e. Organizational Unit:**

Department Name:

Ohio Department of Development

Division Name:

Community Development Division

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix: Mr. \*First Name: Michael  
Middle Name: A.  
\*Last Name: Hiler

Title: Office Chief

Organizational Affiliation: Office of Housing and Community Partnerships

\*Telephone Number: (614) 466-2285

Fax Number: (614) 752-4575

\*Email: Michael.Hiler@development.ohio.gov

**Application for Federal Assistance SF-424**

Version 02

**\*9. Type of Applicant 1: Select Applicant Type:**

A.State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\*Other (Specify)

**\*10 Name of Federal Agency:**

**U. S. Department of Housing and Urban Development**

**11. Catalog of Federal Domestic Assistance Number:**

14.228 \_\_\_\_\_

CFDA Title:

Community Development Block Grants/State's Program \_\_\_\_\_

**\*12 Funding Opportunity Number:**

FR-5447-N-01 \_\_\_\_\_

\*Title:

Formula Allocations & Program Requirements for Neighborhood Stabilization Program Formula Grantees \_\_\_\_\_

**13. Competition Identification Number:**

\_\_\_\_\_

Title:

\_\_\_\_\_

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

754 Census tracts in the State of Ohio (see State of Ohio Neighborhood Stabilization Program 3 Application)

**\*15. Descriptive Title of Applicant's Project:**

State of Ohio's Neighborhood Stabilization Program 3 Affordable Rental Housing Initiative

**Application for Federal Assistance SF-424**

Version 02

**16. Congressional Districts Of:**

\*a. Applicant:

\*b. Program/Project:

**17. Proposed Project:**

\*a. Start Date: July 1, 2011

\*b. End Date: December 31, 2012

**18. Estimated Funding (\$):**

Federal	\$11,795,818
State	_____
Local	_____
Other	_____
<b>TOTAL</b>	<b>\$11,795,818</b>

**\*19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on \_\_\_\_\_
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E. O. 12372

**\*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

- Yes
- No

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

**Authorized Representative:**

Prefix: Mr. \*First Name: Robert  
Middle Name: P.  
\*Last Name: Stempfer  
Suffix: \_\_\_\_\_

\*Title: Deputy Chief Legal Counsel

\*Telephone Number: (614) 466-1714

Fax Number: (614) 728-4920

\* Email: Robert.Stempfer@development.ohio.gov

\*Signature of Authorized Representative:

*Robert P. Stempfer*  
INTERIM CHIEF LEGAL COUNSEL

\*Date Signed: JANUARY 26, 2011

## 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:	
<ul style="list-style-type: none"> <li>• With the highest percentage of home foreclosures?</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>• With the highest percentage of homes financed by subprime mortgage related loan?; and</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>• Identified by the grantee as likely to face a significant rise in the rate of home foreclosures?</li> </ul>	<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 type="checkbox"/>
Did you include the map as an attachment to your Action Plan?	<input type="checkbox"/>
<b>ONLY Applicable for States:</b> Did you include the needs of all entitlement communities in the State?	<input checked="" type="checkbox"/>

### 3. Definitions and Descriptions

	Yes
Are the following definitions and topics included in your substantial amendment?:	/
<ul style="list-style-type: none"> <li>• Blighted structure in context of state or local law,</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>• Affordable rents,</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>• Ensuring long term affordability for all NSP funded housing projects,</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>• Applicable housing rehabilitation standards for NSP funded projects</li> </ul>	<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>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>The number of units that will result in displacement,</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>The manner in which the grantee will comply with URA for those residents?</li> </ul>	<input checked="" 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:	
<ul style="list-style-type: none"> <li>Eligible use or uses?</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>Correlated eligible CDBG activity or activities?</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>Associated national objective?</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>How the activity will address local market conditions?</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>Range of interest rates (if any)?</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>Duration or term of assistance?</li> </ul>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>Tenure of beneficiaries (e.g. rental or homeowner)?</li> </ul>	<input checked="" type="checkbox"/>

• If the activity produces housing, how the design of the activity will ensure continued affordability?	<input checked="" 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?	<input checked="" 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"/>

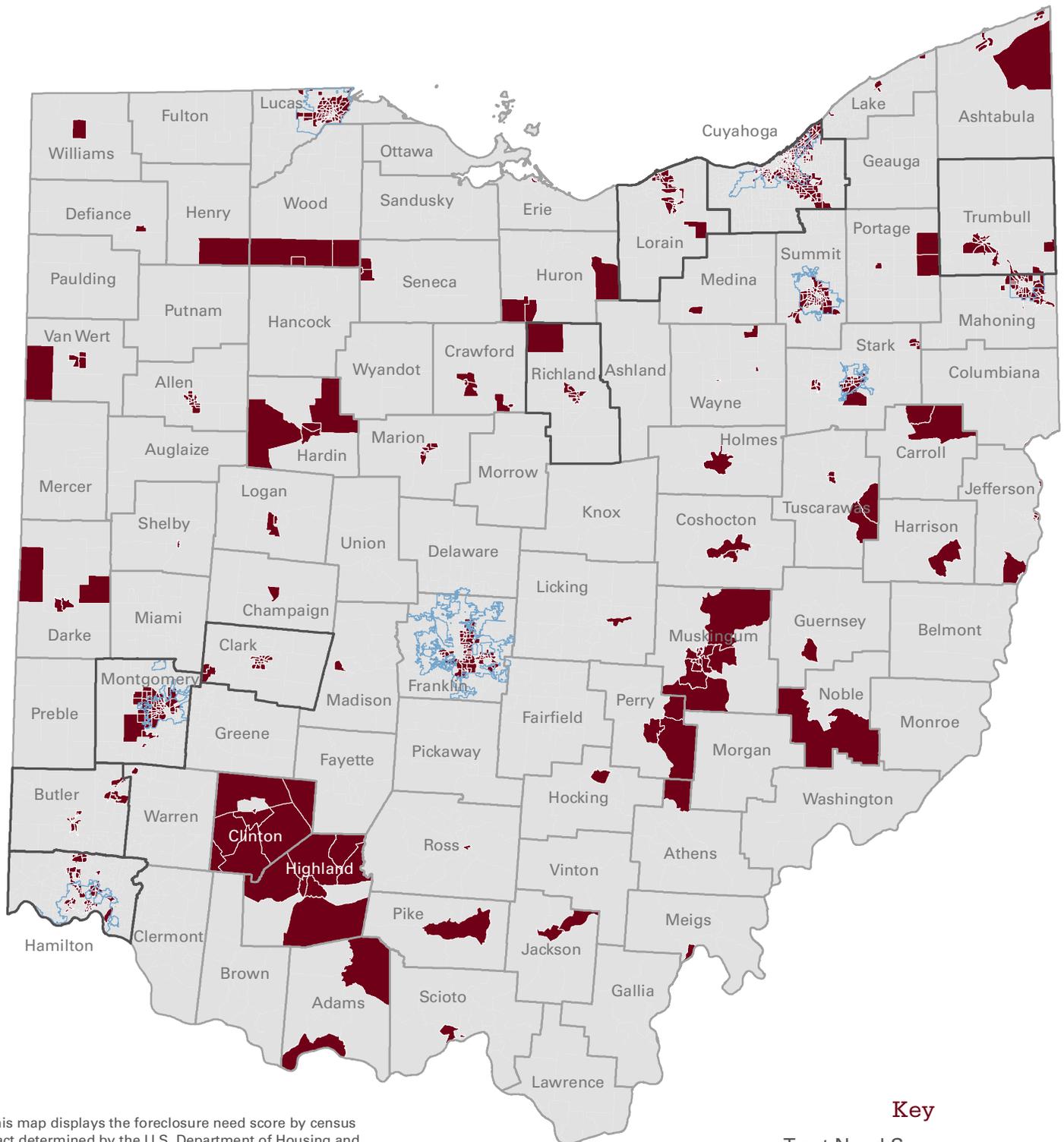
## **Attachment 1**

# Foreclosure Need Score by Census Tract

## Neighborhood Stabilization Program 3



Department of Development



This map displays the foreclosure need score by census tract determined by the U.S. Department of Housing and Urban Development for the third round of the Neighborhood Stabilization Program (NSP 3). Higher scores indicate greater foreclosure stress and a minimum average score of 17 is required for targeting by a grantee under the NSP 3 program.

Source: <http://www.huduser.org/portal/datasets/NSP.html>

Prepared for: Office of Housing and Community Partnerships, Ohio Department of Development (PR & SP January 2011)

### Key

#### Tract Need Score

- Less than 18
- 18 - 20
- NSP3 Funded City
- NSP3 Funded County

## **Attachment 2**

## Ohio Neighborhood Stabilization Program (NSP) 3 Affordable Rental Housing Initiative Guidelines

### Introduction

As a result of the enactment of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 by Congress, the U.S. Department of Housing and Urban Development (HUD) awarded \$1 billion of funds to states and communities across the country to address the nation's abandoned and foreclosed homes crisis through the Neighborhood Stabilization Program (NSP) 3. The Ohio Department of Development (ODOD) received an NSP 3 allocation of \$11,795,818. ODOD is allocating \$11,590,000 of the funds to the Ohio Housing Finance Agency (OHFA) for distribution through the Affordable Rental Housing Initiative. The remaining funds will be expended by ODOD for administration.

### Purpose

The purpose of the initiative is to encourage the redevelopment or rehabilitation of demolished, foreclosed, abandoned or vacant homes and residential properties into affordable rental housing. The goal is to fund at least five projects to redevelop/rehabilitate at least 150 affordable rental units.

The NSP 3 funds may be awarded to fund projects:

- in conjunction with Low-Income Housing Tax Credit (LIHTC) Program, Housing Development Gap Financing (HDGF) Program and Multifamily Housing Bond and Bond Credit Programs; or
- as a standalone grant, provided that the proposed project meets the HDGF program requirements.

### Eligible Award Recipients

Award recipients must be a for-profit development entity, nonprofit organization [i.e., 501(c)(3)] or a public housing authority.

### Eligible Projects

To be eligible for funding, the applicant must propose to redevelop or rehabilitate demolished, foreclosed, abandoned or vacant homes and residential properties that serve households with incomes at or below 50 percent of the area median income. In addition, the proposed projects must be located in a target census tract as defined in the State of Ohio's Action Plan for the NSP 3 funds.

When considering NSP 3 funding requests, OHFA will review the project to ensure that OHFA and HUD requirements are met. In addition, OHFA will consider the capacity and experience of the development team working with demolished, foreclosed, abandoned or vacant homes and residential properties; the development team's ability to proceed; and the geographic dispersion of NSP 3 funding. Also, OHFA reserves the rights to limit the number of NSP 3 awards per sponsor.

### Maximum Award Amount

The Affordable Rental Housing Initiative grant ceiling is \$2 million. However, a grant ceiling waiver may be requested. To determine the NSP 3 funding award amount, OHFA will consider the:

1. financial feasibility of the project;
2. reasonableness of the percentage of total project costs that will be subsidized; and
3. participation of other funders.

## **Community Participation**

Applicants must demonstrate that a proposed project contributes to an existing community redevelopment plan or, for projects located in a community that received a direct NSP 3 allocation from HUD, is consistent with the community's NSP action plan. If no plan exists, the applicants must demonstrate local government support and explain why the proposed project is needed and will be sustainable during the compliance period.

## **Affordability Requirements**

Rent and occupancy restrictions apply to all units in the project. "Rent" and "income" must be calculated based on the LIHTC Program rules. The rent and occupancy restrictions must be maintained for a minimum of 20 years. An exception will be provided for projects involving the sale of the units to eligible residents after the 15<sup>th</sup> year in the affordability period.

## **Other Requirements**

There is a required minimum discount of 15 percent for each eligible property purchased with NSP 3 funds. In addition, funding recipients must comply with the applicable federal requirements, including, but not limited to, Davis-Bacon Wage Rates, Environmental Review, Acquisition and Relocation Requirements, Rehabilitation Standards, Fair Housing and Accessibility, and Lead Paint Hazard Control. In addition, funding recipients at a minimum, must comply with the Enterprise Green Communities Standards. For more information, visit <http://www.hud.gov/offices/cpd/communitydevelopment/programs/neighborhoodspg/index.cfm>. Also, projects will be required to meet the property standards and rental housing qualification standards for the HOME Investment Partnerships Program.

## **Application Submission Deadlines**

To receive funds, applicants must submit applications during the applicable funding rounds, as listed below, and submit the necessary documentation. Application submission information for each program can be found at <http://www.ohiohome.org>.

The NSP funds will be awarded to eligible projects as non-committed funds are available. Funding rounds are scheduled as follows:

- 2010 and 2011 Multifamily Bond and Bond Credits - applications submitted after July 1, 2010.
- NSP 3 Only – applications accepted beginning February 22, 2011 - must follow HDGF Program requirements.
- 2011 LIHTC applications – applications received after October 1, 2010.

All applicants are required to contact OHFA staff prior to application submission in order to discuss their proposal.

## **Award Structure**

Standard funding terms will be grants or loans with interest rates of two percent with repayments based on available cash flow. These terms may be modified based on the financial need of the project.

## **Administration**

Funding requests will be reviewed and approved by the OHFA Board. The administration of the funding award, including issuance of funding agreements, processing of funding draws, performance reporting, and long-term compliance will be coordinated directly through OHFA.

## **Program Contact**

Questions regarding the initiative should be directed to Sean Thomas, OHFA Office of Planning, Preservation and Development Director, by telephone at (614) 466-0400 or by e-mail at [sthomas@ohiohome.org](mailto:sthomas@ohiohome.org).

**Attachment 3**



## Ohio Neighborhood Stabilization Program (NSP) 3

### Comments Received During the Period November 22 – December 15, 2010

---

**Commenter: Arnold Oliver, Holmes County**

Comment: NSP1 accomplished some fantastic things for Holmes County by addressing a very blighted neighborhood within the Village of Millersburg. We demolished 4 structures and renovated 2 homes within a small target area. Additionally, we demolished many more structures outside the target area within Millersburg and in other villages. The impact of this will be lasting and create opportunities that were previously impossible. Unfortunately, Holmes County was eliminated from NSP2 because the foreclosure rate within our census tracts was not sufficient to meet the guidelines. We are now requesting Holmes County be considered for NSP3 funds regardless of foreclosure rates. Slum and blight exists throughout the county and in particular is most evident in the villages. In addition to "home repair" and "demolition", we are also proposing NSP3 funds be used for rental rehabilitation. The availability of affordable rental properties is identified in the Community Housing Improvement Strategy (CHIS) and is a frequent discussion point at the Housing Advisory Committee (HAC) meetings. Our CHIP grant includes 2 rental rehab projects and it is our recommendation to expand this through NSP3. Thanks for the chance to provide input.

**Commenter: Diane Sheridan, City of Barberton**

Comment: NSP3 input for Substantial Amendment: Demolition, Acquisition/Rehab/Resale, Acquisition/Demo, Acq/Rehab/Rental

**Commenter: Holly Johnson**

Comment: Adams County has had positive results from NSP1. The county was able to complete 17 Projects with this round of funding. Adams County currently has 23 projects for Demo on a waiting list.

**Commenter: Mary Ann Hopper, Habitat for Humanity-Greater Columbus**

Comment: Hello, We received OHCP's memo dated 11/22/2010 requesting input regarding the expenditure of the state's \$11.8 million in NSP3 funds. Our Habitat for Humanity affiliate serves only Columbus and Franklin County. Since the City of Columbus has received its own allocation of NSP3 funds, I believe a nonprofit would be ineligible for a sub-grant of the state's allocation for a project within Columbus. Is this correct? Would it be allowable for a nonprofit organization to receive a sub-grant of NSP3 funds for a project located in Franklin County but outside the city limits of Columbus? Thank you.

**Commenter: Amy W. Schocken, CDC of Ohio, Inc.**

Comment: For what it's worth, here are my suggestions: 1. Request a waiver from HUD to allow more than 10% to be used for demolition. I suggest as much as possible. Then distribute the funds to the NSP 1 grantees who have spent the most funds. Not obligated, spent! 2. If 90% must be used for redevelopment etc., I suggest either soliciting proposals from non-profits or housing agencies that redevelop or construct LMI units OR Give all the money to OHFA to spend on eligible projects. I do not see most local communities being able to spend the funds on homeowner redevelopment, ie DPA or acquisition resale. Eligible rental activities are a possibility, but there is usually a non-profit involved, ie, MRDD, Mental Health, Habitat. Good Luck.

**Commenter: William L. Cowan, City of East Liverpool**

Comment: By being part of the NSP the City of East Liverpool has been able to take advantage of Program funding to demolish, as of this writing, 55 vacant dilapidated houses. In addition to the 55 demolished houses the City has 8 more under contract that will be funded via the NSP Program and are scheduled to be razed within the next 30 to 45 days making it a total of 63 dilapidated properties that will have been removed from our neighborhoods. At the onset of the program the City identified around 50 vacant dilapidated residential buildings. The more time our inspectors spent looking for vacant dilapidated residential buildings the more they found. As the NSP Program time for submittal of dilapidated properties for demolition drew near we had identified a total of 95 properties. Since our last bid letting in June we have identified 11 more, 106 total. To summarize, 106 vacant dilapidated properties have been identified of which 63 will have been demolished via the NSP Program leaving 43 vacant dilapidated properties scattered throughout our City that will remain due to a lack of funding. Up until 4 years ago the City would budget enough funds to facilitate the demolition of one or two houses per year. When the City demolition funds dried up, for two years running, a local foundation stepped up and donated money to the City for demolition of vacant dilapidated properties. However, since the start of the City participation in the NSP Program the donations have stopped. The City of East Liverpool's population has been in a steady decline over the last several years as evidenced by the US Census Bureau. Population in 1990; 13,654. Population in 2000; 13,089. Estimated population in 2009; 11,963. People are leaving the City and they aren't taking their homes with them. For the most part they are abandoning them. Removal of dilapidated housing from an otherwise healthy neighborhood affords nearby residences hope that investments made in keeping their home in good repair has not been a wasted effort. Eliminating blight from our neighborhoods helps to remove drug houses, crime and the always present potential for fire. By funding the removal of vacant dilapidated homes the NSP Program has directly touched the lives of many in East Liverpool in the most positive way by making neighborhoods safer and more attractive by creating an improved environment in which to live and grow. In closing, I want to thank you for this opportunity to give input regarding the expenditure of NSP 3 funds and ask that you consider setting aside a portion of the funds for continued demolition of vacant dilapidated houses. There is more blight to fight. We can't stop now.

**Commenter: Matthew Davis, Maumee Valley Planning Organization**

Comment: Demolition Activity has proved to be quite successful in Region 1. I would suggest allowing as much demo as possible. Best 'bang for the buck' and our communities are very appreciative with the assistance in removing problem structures. Acquisition/Rehab/Resale is a good activity, but very time consuming & expensive. We have some great units, but getting traffic through/interest in is proving challenging. Perhaps opening up some DPA funds for the 120% limit would also be a wise choice. Many of our area realtors have expressed that securing a loan is difficult for most folks interested in purchasing a home. With a little cash infusion into the deal, perhaps we can assist in getting the housing market active again. I'm re-checking the availability of the Yeager properties in Napoleon I shared with you some time ago. Potentially, this could be a three unit acquisition/demo and replacement project...could use up a nice chunk of change.

**Commenter: Ron Barnhart, Village of Lordstown**

Comment: I am responding to a document dated November 22, 2010 I received from Michael A. Hiler, Chief of Housing and Community Partnerships. The document requested our input regarding the proposed expenditure of some \$11,795,818. To be used for neighborhood revitalization, including razing of condemned buildings. The Village of Lordstown finds the program to be inapt in that the Village cannot use this funding to raze a condemned building sitting at the center of town and is becoming a major eyesore. Last year Trumbull County had in excess of \$1,000,000 unused in the NSP program that the Village was ineligible to use due to the medium household income of this census tract. Meanwhile we have a vacated and condemned school building that we were unable to use the NSP funding for. The program should be amended to exclude any medium household incomes therefore making the Village of Lordstown eligible to use NSP funds to demolish this eyesore.

**Commenter: Julie Marie Green, Trumbull County**

Comment: Trumbull County received notice from HUD that we are scheduled to receive a direct grant from their office in the amount of \$1,143,889 of which at least 25% must be utilized for housing development that serves very low-income persons. We plan to utilize NSP3 funds to assist in completing rehab activities for houses purchased under NSP 1 if necessary and shall continue to work with the non-profit arm of the local PHA to create affordable rental opportunities. We also plan to request a waiver to utilize the balance of the funds or \$743,527 for demolitions - to date we have received requests from Trumbull communities to demolish an additional 115 structures (not including the City of Warren). Trumbull County will submit an abbreviated action plan outlining the NSP3 plan in January 2011. The average demolition cost for a house with asbestos under NSP 1 was between \$10,000 and \$30,000 depending on the amount to be remediated. Based on these figures, Trumbull County anticipates the need for additional demolition funding under NSP 3 from the State of Ohio to utilize county wide including the City of Warren.

**Commenter: Joseph Jones, Burten, Bell, Carr Development, Inc.**

Comment: My only comment regarding NSP3 funds is that more consideration be given to addressing the security aspects of neighborhood, structural, and community stabilization. By this I am referring to issues of defensible space relative to any newly revitalized homes. While issues pertaining to Green Development, and Internet Accessibility are, and will continue to remain vital, on a more fundamental level I believe that the basic security of the resident should be given more consideration. Please given thought to possible mandatory rehab security features such as perimeter fencing, motion lights, security systems, and so forth.

**Commenter: Dorothy Ferris, Brown County**

Comment: Dear Sir or Madam, Brown County was lucky enough to be part of a consortium for the first NSP funds. This consortium was united in what it chose to do in their communities. The large majority of the funds were used for Demolition. I would like to include demolition in the NSP 3 expenditures. This type of project greatly improved the appearance of many of our communities. Unfortunately, additional funds are needed to finish what we have started. Thank you for your consideration on this matter.

**Commenter: Angela Byington, City of Elyria**

Comment: The City of Elyria would like to see the funds made available to all communities that **did not receive a direct allocation of NSP3 funds**. Distribution of funds should be based on the NSP 1 allocation. Communities not receiving an initial direct allocation, but did receive funding through a direct NSP3 recipient should still be permitted to receive funds from the state. Thank you.

**Commenter: Kenneth Lengieza, Marion City/County Regional Planning Commission**

Comment: Given the fact that the amount allocated to the State of Ohio is small for NSP 3, and given the fact that many large and moderate sized Cities and Counties have received direct NSP grants in either NSP 1, NSP 2, or NSP 3. And given the fact that some of the moderate sized City's awards were for a very substantial sum of money, we suggest the following: NSP 3 funds for the balance of the State be eligible for only communities that **never did or will receive ANY** direct grant award in either NSP 1, 2, or 3 from HUD. Thanks for letting us comment.

**Commenter: Mayor John Geddis, City of Toronto**

Comment: The monies should be used for demolition of residential and commercial structures.

**Commenter: Donnie Mitchell, City of Mansfield**

**Comment:** This is in response to the Ohio Department of Development's notice to comment on your NSP-3 allocation. The City of Mansfield is very interested in again receiving a direct allocation from The Office of Housing and Community Partnerships in the amount of \$11,795,818. As you may already be aware, Mansfield is only one of four communities not receiving a direct allocation of funding based on the NSP-1 allocation. With the NSP-1 funding from ODO, Mansfield and our sub recipient Habitat for Humanity, has acquired fifteen properties representing about 2/3 of our funding to Acquisition-Rehab-Resell. Based on the NSP-3 regulations, the primary activity is to acquire properties, rehab and resell and Mansfield has the ability to achieve this task. We anticipate completing all the renovations of the City's twelve properties by the end of January, 2011. Most of the properties are presently on the market for sale, one property has been sold, and we have a closing set on our second property by the end of the year. Mansfield has also been successful in obligating seventy six properties under NSP-1 for demolition with over two thirds of the properties demolished at this time. The City of Mansfield has shown the ability to expend the funding under NSP-1 and requests financial assistance from NSP-3 from The Office of Housing and Community Partnership. Mansfield has been faced with many challenges in 2010 including the loss of our General Motors Plant as well as other supporting businesses and jobs, unemployment still in double digits, foreclosures continue to increase, property vandalism continues to increase and property values continue to fall. The NSP program has been a positive program for this community and additional funding is greatly needed.

**Commenter: Dale Hartle, Ohio Regional Development Corporation**

**Comment:** I and my staff have given a lot of thought to the possibilities for the NSP3 program. Our thoughts follow along the lines of possibilities of a combination of many of the programs we already operate, or have operated in the past. With this email, I am attaching two maps. The first map shows where we currently work, as well as where our satellite offices are. We have a staff of 20 trained and very capable people who understand the housing business very well, and are also very experienced in the art of administration. The second map I have attached is one that shows where we would be very comfortable working to administer NSP3. I grant you that with this map we are taking in a large portion of the state, however we are currently traveling through most of it to go to places we now serve. Let me talk about types of projects we would propose to do. ORDC has done a lot of rental rehab projects across the years, and have been very successful in administering a program that is sometimes difficult. Our recent analysis is that there is again a significant demand for rental rehab dollars, and in fact we are partnering with a large land lord to do a rental rehab new construction in Bellaire Ohio for the NSP2 program. That partner is very interested in doing even more new construction, or purchase and rehab existing housing stock into rental housing for the low income in a variety of areas , where ever is permitted by NSP3 guidelines. We have been doing exploratory work for NSP2, and have a very strong interest in Morrow County to build a new multi family low income housing complex where there is a very strong demand. Discussions have already taken place with the Morrow Co. development office, and they have had those discussions with one of the communities who would like to have the facility. The two I have mentioned would be larger facilities, but there are others that have smaller rental operations who are very willing to be considered for housing development, and assistance for low income rentals. The next area I would suggest would be more for housing acquisition and rehab and resale. In all of the area we work the demand is far greater than the dollars we have to spend. The last area of possibility that I would very strongly suggest, is the development of an area in Coshocton that we have spent a considerable amount of money on with NSP1 dollars to remove debris from a falling down, abandoned factory known as Home Candy, located on North 15<sup>th</sup> St. in Coshocton. As of this date, the removal of debris is all complete, and grading of the site is occurring. The site is 2.5 acres within an existing residential neighborhood that is stable. At the present, a phase 11 environmental assessment is occurring. If a "clean" site is a result, the City is prepared to take ownership by foreclosure for residential development. This is a wonderful site for rental development, and we are interested in that as a site. All of the projects we would propose would first be vetted to be in the correct census tract areas for the NSP3 program, and to be in sync with the program guidelines. We would be open to suggestions from OHCP to target to various areas, or to act as a program administrator for areas that already had some local staff capacity. ORDC feels confident that in these areas we could easily handle \$6 million dollars to do projects. I obviously understand that is more than half of the money allocated for the State, and

would not be presumptuous. I simply want to tell you of our capacity and the need we see out there. Let me go on to say that having worked in both NSP 1 and 2, we strongly recommend the NSP2 administrative model, and find that much better to work with, and easier to administer. The Sub recipient concept, while working, was very cumbersome, and sometimes the lead agency concept created undue difficulty. Thank you for your consideration for these suggestions, and we would welcome the opportunity to work with you on NSP3. Thank you.

**Commenter: Michelle Heritage Ward**

**Comment:** The Community Shelter Board has the following comments about the use of these funds: allow developers of permanent supportive housing to purchase land for future PSH projects. The land can be held for 10 years, based on NSP rules (land bank provisions); allocate dollars for redevelopment of residential properties and create affordable housing units for tenants leaving current permanent supportive housing projects. Usually tenants will leave with a Section 8 voucher that will help on the affordability side. This strategy will improve the turnover in the PSH units while making sure that the tenants will have some after care in these "move-up" units. Thank you for your consideration.

**Commenter: Paul Z. Tecpanecatl, Poggemeyer Design Group, Inc.**

**Commenter:** NSP 3 comments & suggestions

- Eligible applicants should be past recipients of NSP 1 or 2 funds
- For flexibility, it would be nice if the NSP 3 Funds could be held by the State as a large pool of funds available for eligible grantees & projects on a first come first serve basis until all the funds are obligated. This would avoid cumbersome GA's and assure faster use of the funds. This would also avoid embarrassing recapture of unused funds. The downside would be that the money may not be going to areas that are "most in need" or be used only by aggressive grantees.
- Since only 10% of the funds can be used for residential demolitions, would OHCP have the ability to establish a demo pool on a first come first serve basis? In this way, eligible communities could expend more funds on demolition rather than using only 10% of their smaller allocations.
- Multi-family projects in rural areas are tough to finance and process.
- We have had good success with our Habitat affiliates but production has been limited.
- Acquisition/rehab tied to homebuyers has been somewhat successful and popular once word got out but the processing time takes much longer than CHIP homebuyer cases.
- For NSP 1, the timeframe for drawdowns has been extremely long, in part due to the various governmental entities that the money must pass through (lead entity and subrecipient entity) and then on to the contractor or developer.
- We experienced a dispute using NSP 1 funds and had to go through mediation. The process was long, cumbersome and expensive. A warning to all.

**Commenter: Mary Jo Smith, City of Lancaster**

**Comment:** The Mayor of the City of Lancaster, Ohio, forwarded to me a copy of a letter regarding the submittal of comments under the NSP3 program. On behalf of the city, I would like to express a comment regarding the award process of NSP funding allocations. Under the NSP1 program, Fairfield County was the grantee and the city was to act as a subrecipient award agency. Under the NSP1 program, a large percentage of the projects were undertaken within the city, although the grantee was Fairfield County, Ohio. Due to the large percentage of projects occurring within the city, I feel that demonstrates there is a greater need for project delivery of NSP projects within the city. Also, the City of Lancaster is a CDBG entitlement community which would create the possibility of the leverage of additional federal, state, and local dollars. Therefore, I would like to submit an official suggestion and comment that the City of Lancaster, Ohio, be awarded a direct allocation under the NSP3 program if the same funding mechanisms are utilized as they were under the NSP1 Program. Thank you for considering the city's comments.

**Commenter: Phil Snider, Phil Snider LLC**

Comment: Here are my suggestions for how to distribute the NSP-3 funds: although I have not seen which census tracts are even eligible (and have not even bothered to try to find out), my suggestion is to award NSP-3 grants on a competitive basis; maximum grant request of \$1,000,000; a minimum of 75% of the funds are to be awarded to "NSP-3 non-entitlement" grantees (grantees that have not received a direct NSP-3 award from HUD); a maximum of 25% of the funds can be awarded to "NSP-3 entitlement" grantees (grantees that have received a direct NSP-3 award from HUD); application deadline would be the same day as the CDBG Formula Program and CDBG Neighborhood Revitalization Program. This would allow grantees the opportunity to leverage dollars and coordinate with other funding sources. Only "Formula Grant" eligible units of local government may be grantees. Do not let non-profits or other agencies be grantees, such as OHFA, CAC's, planning commissions, CHDO's, housing non-profits, etc. Allow unit of local government grantees to coordinate with these agencies. That's the 'high' points. Ok, it's snowing and I need to get on the road and join Heidi Crabtree and Bill Bope at lead risk assessor training in Marysville.

**Commenter: Bob Klocinski, Lucas County**

Comment: Lucas County, Ohio has recently established a land bank to help deal with the issues of foreclosed and vacant homes. We believe this land bank can have a long-term, positive impact on the neighborhoods of Lucas County. For this reason, we would ask that the State of Ohio consider that NSP 3 funds be allocated to Lucas County for this purpose. In NSP 1, Lucas County was "partnered" with a consortium of Wood County, the City of Bowling Green and the City of Oregon. While a great deal was learned and accomplished with these NSP 1 funds, we believe that a consortium of this type would not be as effective with NSP 3. Again, Lucas County would like to use any available NSP 3 funding to assist the newly chartered county land bank. Thank you for your consideration.

**Commenter: Debbie Greenebaum, Resident Home Corporation**

Comment: I know I am one day short but hoping to still get to give input re: NSP 3 funds. Priority should be given as much as possible to using funds for affordable rental for people with disabilities and their families!!!! Thank you.

**Commenter: Donald L. Plasquellic, City of Akron Mayor**

Comment: The City of Akron was awarded \$2,988,500 of State Neighborhood Stabilization Program funds to stabilize neighborhoods hardest hit by foreclosure and abandonment. We are greatly appreciative of the funds received. As of May 24, 2010, we have obligated 100% of our State NSP award. Akron is one of three entitlement communities throughout Ohio without the benefit of NSP 2 funds to assist in the transformation of our neighborhoods. Additional State NSP funds would allow us to continue reversing the impact of foreclosures in our neighborhoods. The Office of Housing and Community Partnerships requested input regarding the expenditure of NSP 3 funds. As OHCP prepares the FY 2010 Substantial Amendment to the Ohio Consolidated Plan, the State should consider the following: community need; equity of distribution – size of NSP 2 award; timely obligation of NSP 1 funds; capacity to implement NSP 1, NSP2 and NSP 3; foreclosure v. NSP funds awarded. Your consideration of this matter is greatly appreciated.





## **Attachment 4**



## Ohio Neighborhood Stabilization Program (NSP) 3

### Comments Received During the Period February 3-18, 2011

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**Commenter:** Phil Snider, Owner, Phil Snider, LLC

**Comment:** I am opposed to the proposed Draft FY 2010 Ohio Consolidated Plan Substantial Amendment in which the Ohio Housing Finance Agency would be awarded \$11.5 million in Neighborhood Stabilization Program 3 (NSP-3) funds to undertake approximately five Affordable Rental Housing Initiative projects, consisting of 150 rental units. This would amount to a NSP-3 subsidy of approximately \$76,667 per dwelling unit.

I would rather see OHCP establish a competitive grant program for NSP-3 whereby units of local government would be awarded substantial grants (minimum grant awards of \$500,000). As part of the competitive application scoring process, I would like to see it be a requirement that the units of local government would have to partner/collaborate with for-profit and/or non-profit housing developers for the development of affordable rental housing projects.

Thank you for accepting public comments on the proposed amendment to the FY 2010 Ohio Consolidated Plan.