

Application for Federal Assistance SF-424		Version 02
<b>*1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>*2. Type of Application</b> * If Revision, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision  *Other (Specify) _____
<b>3. Date Received:</b>	<b>4. Applicant Identifier:</b> OH 399061	
<b>5a. Federal Entity Identifier:</b>		<b>*5b. Federal Award Identifier:</b>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b>	<b>7. State Application Identifier:</b>	
<b>8. APPLICANT INFORMATION:</b>		
<b>*a. Legal Name:</b> Hamilton County, Ohio		
<b>*b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 31-6000063		<b>*c. Organizational DUNS:</b> 134718100
<b>d. Address:</b>		
<b>*Street 1:</b>	138 E. Court Street, Room 1002 _____	
<b>Street 2:</b>	_____	
<b>*City:</b>	Cincinnati _____	
<b>County:</b>	Hamilton _____	
<b>*State:</b>	OH _____	
<b>Province:</b>	_____	
<b>*Country:</b>	U.S.A. _____	
<b>*Zip / Postal Code</b>	45202 _____	
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Community Development		<b>Division Name:</b>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b>	Ms. _____	<b>*First Name:</b> Susan _____
<b>Middle Name:</b>	S. _____	
<b>*Last Name:</b>	Walsh _____	
<b>Suffix:</b>	_____	
<b>Title:</b>	Director	
<b>Organizational Affiliation:</b>		
<b>*Telephone Number:</b> 513-946-8235		<b>Fax Number:</b> 513-946-8240
<b>*Email:</b> susan.walsh@hamilton-co.org		

**Application for Federal Assistance SF-424**

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

B. County 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 & Urban Development

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

14.218 \_\_\_\_\_

CFDA Title:

Neighborhood Stabilization Program \_\_\_\_\_

**\*12 Funding Opportunity Number:**

\_\_\_\_\_

\*Title:

Neighborhood Stabilization Program 3 \_\_\_\_\_

**13. Competition Identification Number:**

\_\_\_\_\_

Title:

\_\_\_\_\_

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

Hamilton County, Ohio

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

Hamilton County NSP 3

<b>Application for Federal Assistance SF-424</b>		Version 02
<b>16. Congressional Districts Of:</b>		
*a. Applicant: one and two		*b. Program/Project: one and two
<b>17. Proposed Project:</b>		
*a. Start Date: May 1, 2011		*b. End Date: April 30, 2014
<b>18. Estimated Funding (\$):</b>		
*a. Federal	_____	\$1,469,242
*b. Applicant	_____	
*c. State	_____	
*d. Local	_____	
*e. Other	_____	
*f. Program Income	_____	
*g. TOTAL	_____	\$1,469,242
<b>19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>		
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on _____		
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.		
<input checked="" type="checkbox"/> c. Program is not covered by E. O. 12372		
<b>20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)</b>		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>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)</b>		
<input checked="" type="checkbox"/> ** 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		
<b>Authorized Representative:</b>		
Prefix: Mr.	_____	*First Name: Christian _____
Middle Name:	_____	
*Last Name:	Sigman	_____
Suffix:	_____	
*Title: Acting County Administrator		
*Telephone Number: 513-946-4420		Fax Number: 513-946-4444
* Email: christian.sigman@hamilton-co.org		
*Signature of Authorized Representative: <i>Christian Sigman</i>		*Date Signed: 2/23/11

## 1. NSP3 Grantee Information

NSP3 Program Administrator Contact Information	
Name (Last, First)	Walsh, Susan
Email Address	Susan.Walsh@hamilton-co.org
Phone Number	513-946-8235
Mailing Address	138 East Court Street, Suite 1002, Cincinnati, OH 45202

## 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 main data source used in determining our areas of greatest need was the HUD NSP3 Mapping tool. In addition to this tool, we also analyzed capacity, availability of REO properties from NSP1, predictions of future REO properties (from NCST), property sales from NSP1, vacancy data from the HUD mapping tool, community size, studies completed by Working in Neighborhoods, housing stock knowledge from community site visits, environmental and historical data, and NSP2 investments.

### 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.

Response:

To establish our areas of greatest need, we began by inputting our original 15 targeted communities from NSP1 into the HUD NSP3 mapping tool - all census tracts for each community were inputted. From this we were able to identify where each community stood in terms of their NSP3 need score. A few communities from the first round of funding have improved and their NSP3 need scores were much lower than the minimum state threshold. This reduced the number of communities to 11. Cheviot, Cleves, Norwood, and Silverton were eliminated. The remaining 11 communities had NSP3 need scores that averaged 17 or higher; this equated to 37 census tracts.

From there we eliminated all the census tracts with a score of 17 or lower, due to the high number still remaining for determination. This left census tracts with scores of 18, 19, and 20 and reduced the number of communities to eight and the number of census tracts to 13 (St. Bernard, Woodlawn, and Lockland were removed). From this point on we only examined data for the highest scoring census tracts within each community and only those census tracts that were wholly contained within one community (some census tracts crossed jurisdictional boundaries), which further reduced the number of census tracts to nine, while the number of communities remained at eight.

It was then determined that we would only examine one census tract within each of the remaining eight communities. That was decided after examining the HUD estimated impact numbers and realizing that our grant size would not be large enough to make an impact in multiple census tracts within a single community. Forest Park was the only community with two census tracts; we decided to eliminate the census tract with the largest amount of commercial land use and least amount of residential units. This reduced the number of census tracts to eight.

We then began examining jurisdiction size relative to the size of the targeted census tracts within each community (in terms of the ability of the funds to make a visible impact in the community as a whole). The data indicated three outliers, where the census tract represented 15% or less of the total land area for the community. This reduced the number of communities to five; Colerain Township, Springfield Township and Forest Park were removed.

For the five remaining communities we evaluated environmental and historical considerations that could delay implementation of the program and/or impose costly remedies to achieve compliance. We examined the presence of historical structures, floodplain areas, expressways and railroads. From this we were able to reduce the number of communities to four. Elmwood Place was eliminated due to the presence of several historical properties, being located partially in the floodplain and near a major expressway. These factors created some obstacles for Elmwood Place in the first round of NSP funding.

NSP2 investments were then reviewed from the second round of NSP funding. Mt. Healthy and Golf Manor each received an allocation of at least one million dollars in NSP2 funds. Golf Manor received enough funding to perform acquisition and rehabilitation activities for approximately 11 homes and Mt. Healthy received funding for the development of a low-income, multi-family, senior housing rental project. It was determined that the amount of funding received by Golf Manor was sufficient to visibly impact and stabilize the area (according to the HUD Mapping tool and the number estimating the properties needed to make an impact). This narrowed the communities to three, North College Hill, Mt. Healthy, and Lincoln Heights.

For the three remaining communities, we studied housing stock and how it relates to market demand, availability of REOs (past data and future predictions), past sales of NSP homes, and NSP3 Need Scores, including estimated impact numbers and vacancy data. Lincoln Heights has the highest need score at 20, but lacks a rehabable housing stock, has a weak market, an extremely high vacancy rate (20%) and a dearth of condemned and blighted properties; this makes it not suitable for acquisition/rehab activities, but more apt for demolition and land banking activities. Because of this, we have designated Lincoln Heights, census tract 227.00, as a target area for only demolition and land banking activities.

Due to the extreme targeting required, the estimated impact number we are advised to meet, and the allocation of NSP3 funds the County is slated to receive, it was determined that it would only be feasible to have one target area for acquisition/rehabilitation activities.

North College Hill's targeted census tract has a NSP3 Need Score of 18. According to HUD, the estimated number of properties needed to be rehabilitated to make an impact in the community is seven. The funding provided through NSP3 would allow for the rehabilitation of approximately 11 - 13 houses, several above the minimum expected. A concentrated area of single-family rehabilitation activities has already begun in the community through NSP1, and providing funding through NSP3 would make a substantial impact in the small community. The housing stock in the target area of North College Hill is mostly in rehabable condition; a majority of the homes in the neighborhood are one- to three-bedroom

cape code style homes built in the 1920s to 1940s; the vacancy rate is six percent. Using past sales of NSP1 homes as an indicator, the market in North College Hill has proven to be strong; the three homes that have been completed through NSP1 were under contract within a week of being listed. According to data of properties previously made available through the NCST and predictions of future properties to become available through the NCST, we are confident that acquiring 11 - 13 homes would be easy to achieve. In addition, this data suggests that more eligible properties could become available for land banking activities.

The NSP3 Need Score for the targeted census tract in Mt. Healthy is 19. According to HUD, the estimated number of properties needed to be rehabilitated to make an impact in the community is eight. The funding provided through NSP3 would allow for the rehabilitation of approximately 9 - 11 homes, a few above the minimum expected. Mt. Healthy received an allocation of NSP1 and NSP2 funds, but has not engaged in any acquisition/rehabilitation activities for homeownership, making it difficult to predict the marketability of NSP homes in this neighborhood. According to data provided by the NCST, only two foreclosed properties (compared to 15 in North College Hill) were available for purchase in the past 1.5 years. In addition, the prediction of foreclosed properties to become available for future purchase is not as high as the predicted amount in North College Hill.

When comparing North College Hill and Mt. Healthy utilizing the factors listed above, it was determined that the largest stabilizing impact would be able to be achieved in the city of North College Hill, Ohio. The targeted census tract in this community is 218.02, plus Goodman Avenue, which is immediately adjacent to the census tract boundary.

Thus, Hamilton County Community Development is proposing the Village of Lincoln Heights, Ohio, census tract 227.00, for demolition and land banking activities and the City of North College Hill, Ohio, census tract 218.02 + Goodman Avenue, for acquisition/rehabilitation and land banking activities.

#### Procedures for Preferences for Affordable Rental Development

Due to the existing rental market conditions of Hamilton County and our targeted areas, rental development is not a priority. According to the 2005 - 2009 American Community Survey, 37.8% of the units in Hamilton County are renter-occupied, which is 3.7% higher than the percent renter-occupied in the United States. The renter-occupied rates for Lincoln Heights and North College Hill, our targeted areas, are 70.5% and 33.9% respectively. Hamilton County has a rental vacancy rate of 13.3%, compared to the United States rental vacancy rate of 8.43%. Lincoln Heights and North College Hill have rental vacancy rates of 14.4% and 8.4%, respectively. The number of renter-occupied housing units in our targeted areas is on par or significantly higher than the national average. The same can be said for the rental vacancy rate. The rental vacancy rates of our targeted areas and of the County indicate that this area has an abundance of vacant rental housing on the market, and developing more rental housing could over-saturate the already high number of rental units available.

North College Hill's Comprehensive Plan, written in 2008, specifically mentions promotion and creation of new home ownership opportunities as a priority, and states that "the relatively low rate of home ownership has been a concern of the city of North College Hill and is expected to remain an issue in the near future." According to the 2005 - 2009 American Community Survey, the homeownership rate in Hamilton County (outside of the city) is 77%, while North College Hill's is 66%. Due to this data, the data in the previous paragraph, the data from another section of this plan, and the sentiments from North College Hill's Comprehensive Plan, we decided that developing additional homeownership opportunities

is the most viable option for this community.

As discussed in another section of this plan, the housing market in Lincoln Heights is very weak (the homeownership rate is only 30%) and the number of blighted/condemned structures is extremely high. The large scale redevelopment project (Villas at the Valley) being funded partially with NSP1 and NSP2 dollars has or will create 77 rental units at or below 60% of AMI and 4 units of homeownership, while at the same time ridding the community of severely deteriorated housing. It is believed that scattered-site demolition, in conjunction with the Valley Homes project, will provide much needed stabilization to the area and will provide in-fill housing opportunities once the market in this struggling community improves. It is our opinion, based on the discussed data, that developing additional rental units would not be viable. Demolition would provide the greatest benefit to Lincoln Heights at this time.

### 3. Definitions and Descriptions

#### Definitions

Term	Definition
Blighted Structure	<p>The definition of blighted structure below is from the Ohio Revised Code Section 1.08:</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;</li><li>(c) Tax or special assessment delinquencies exceeding the fair value of the land that remain unpaid thirty-five days after notice to pay has been mailed.</li></ul> <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></ul>

	<p>(h) Is vacant or contains an abandoned structure;</p> <p>(i) Excessive dwelling unit density;</p> <p>(j) Is located in an area of defective or inadequate street layout;</p> <p>(k) Overcrowding of buildings on the land;</p> <p>(l) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness;</p> <p>(m) Vermin infestation;</p> <p>(n) Extensive damage or destruction caused by a major disaster when the damage has not been remediated within a reasonable time;</p> <p>(o) Identified hazards to health and safety that are conducive to ill health, transmission of disease, juvenile delinquency, or crime;</p> <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)(1) 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 county auditor of the county in which the land is located has determined under section 5713.31 of the Revised Code that the land is “land devoted exclusively to agricultural use” as defined in section 5713.30 of the Revised Code.</p> <p>(2) 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> <p>Effective Date: 2007 SB7 10-10-2007</p>
Affordable Rents	We are not proposing to rehabilitate or construct any rental units, but if we do, the units will be subject to the HOME rents.

### Descriptions

<b>Term</b>	<b>Definition</b>
Long-Term Affordability	Hamilton County will follow the HOME program standards as a minimum in complying with the long-term affordability component of the NSP3 program. Funding provided per rental or homeownership unit less than \$15,000 will have a 5-year affordability period, funding provided between \$15,000 - \$40,000 per unit will have a 10-year affordability period, and funding greater the \$40,000 per unit will have a 15-year affordability period. New construction rental projects will have a 20-year affordability period, regardless of the amount of subsidy, as required by the HOME regulations.

Housing Rehabilitation Standards	Residential properties acquired and rehabilitated under this program will be subject to Hamilton County's NSP Residential Rehabilitation Standards. This document includes green and energy efficiency standards that will be required in conjunction with rehabilitation of the residential structure. In addition, units will be subject to the Lead Based Paint regulations, as specified in Section 401 (b) of the Lead Based Paint Poisoning Prevention Act, and 24 CFR Part 35 Subparts B and J.
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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.

<b>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.</b>
Response: Total low-income set-aside <b>percentage</b> (must be no less than 25 percent): 25.00% Total funds set aside for low-income individuals: \$367,322.00

##### Meeting Low-Income Target

<b>Provide a summary that describes the manner in which the low-income targeting goals will be met.</b>
Response: Hamilton County will meet the low-income set-aside requirement through a partnership with Cincinnati Habitat for Humanity. Cincinnati Habitat will develop home ownership opportunities for persons or households whose incomes do not exceed 50 % of the area median income. This has proven to be successful under NSP1, where we have sold 3 homes to households at or below 50% of area median income. Home ownership opportunities will only occur in the targeted area within North College Hill. This will be fulfilled through the redevelopment or rehabilitation of NSP eligible residential property.

#### 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
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If yes, fill in the table below.

Question	Number of Units
The number of low- and moderate-income dwelling units—i.e., ≤ 80% of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.	13
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).	11

The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.	4
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## 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>
<p>Response:</p> <p>The following actions were taken to ensure effective citizen participation in the drafting of our final NSP3 Action Plan for submittal to HUD. On January 24<sup>th</sup>, a draft of the plan was verbally presented at the County Commissioner's public staff meeting, in which comments and suggestions were sought. The draft plan was posted on Community Development's website on February 1<sup>st</sup>, the start of the 15-day comment period, and was additionally made available in our office for public review. An ad was published in the Cincinnati Enquirer, notifying the public that the draft plan was available on our website. The final plan was presented and approved at the County Commissioner's public meeting on February 23<sup>rd</sup>, 2011. The NSP3 Action Plan was submitted to HUD (through DRGR) on February 23<sup>rd</sup> as well. Note: Our Citizen Participation Plan normally requires a 30-day comment period and a public hearing, both of which were waived as part of the expedited participation process described in the NSP3 NOFA.</p>

### Summary of Public Comments Received.

The 15-day comment period ended on February 15<sup>th</sup>, 2011. We did not receive any written comments.

## 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>	Acquisition and rehabilitation of residential property for households at or below 120% AMI
<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>	CDBG eligible activity 24 CFR 570.201(a), (b), (e),(i), (n) and 24 CFR 570.202	
<b>National Objective</b>	Low Moderate Middle Income Housing (LMMH)	
<b>Activity Description</b>	<p>This activity will involve the acquisition of foreclosed, vacant, or abandoned residential properties, followed by rehabilitation of the home, with resale to homebuyers at or below 120% of area median income. Acquisition and rehabilitation activities will be performed by a non-profit developer(s), chosen through an RFQ/RFP process. Financing will be provided in the form of a zero percent interest, partially forgiven loan (amount of financing provided per property is to be determined), that is to be repaid upon sale of the home. Homebuyers will receive down payment assistance up to \$14,999; the assistance will be in the form of a zero percent interest, soft-second mortgage that is forgiven 20% each year over the five-year affordability period. All homebuyers will be required to attend an eight hour (minimum) homebuyer counseling course from a HUD approved counseling agency.</p> <p>The County will provide, to the maximum extent possible, for the hiring of individuals and small businesses that are owned/operated by persons residing in the vicinity of NSP3 projects, with vicinity defined as Hamilton County. This includes, but is not limited to, updating procurement procedures to incorporate preferences for vicinity hiring and specifying in developer contracts the requirement to reach out to local individuals and businesses when hiring or contracting opportunities arise. Local, state, and federal procurement procedures will still be followed.</p>	
<b>Location Description</b>	This activity will occur within our target area in the City of North College Hill, Ohio (census tract 218.02, plus Goodman Avenue).	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$\$680,000.00
	(Other funding source)	\$
	(Other funding source)	\$
<b>Total Budget for Activity</b>	<b>\$680,000.00</b>	
<b>Performance Measures</b>	We expect eight homes to be developed under this activity, with an additional three homes developed using program income .	
<b>Projected Start Date</b>	5/1/2011	
<b>Projected End Date</b>	4/30/14	
<b>Responsible Organization</b>	<b>Name</b>	Hamilton County Community Development
	<b>Location</b>	138 E. Court Street, Suite 1002 Cincinnati, OH 45202
	<b>Administrator Contact Info</b>	Susan Walsh (513) 946-8235 Susan.Walsh@hamilton-co.org

<b>Activity Number 2</b>		
<b>Activity Name</b>	Acquisition and rehabilitation of residential property for households at or below 50% AMI	
<b>Use</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>	CDBG eligible activity 24 CFR 570.201(a), (b), (e),(i), (n) and 24 CFR 570.202	
<b>National Objective</b>	Low-Income Housing to Meet 25% Set-Aside (LH25)	
<b>Activity Description</b>	<p>This activity will involve the acquisition of foreclosed, vacant, or abandoned residential properties, followed by rehabilitation of the home, with resale to homebuyers at or below 50% of area median income. This activity will be performed by Cincinnati Habitat for Humanity. Financing will be provided in the form of a zero percent interest, fully-forgiven loan. Mortgage payments made by the homebuyers to Habitat will be set aside and eventually used on future affordable housing projects within the target area. Homebuyers will receive down payment assistance up to \$14,999; the assistance will be in the form of a zero percent interest, soft-second mortgage that is forgiven 20% each year over the five-year affordability period. All homebuyers will be required to attend an eight hour (minimum) homebuyer counseling course from a HUD approved counseling agency.</p> <p>The County will provide, to the maximum extent possible, for the hiring of individuals and small businesses that are owned/operated by persons residing in the vicinity of NSP3 projects, with vicinity defined as Hamilton County. This includes, but is not limited to, updating procurement procedures to incorporate preferences for vicinity hiring and specifying in developer contracts the requirement to reach out to local individuals and businesses when hiring or contracting opportunities arise. Local, state, and federal procurement procedures will still be followed.</p>	
<b>Location Description</b>	This activity will occur within our target area in the City of North College Hill, Ohio (census tract 218.02, plus Goodman Avenue).	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$\$367,322.00
	(Other funding source)	\$
	(Other funding source)	\$
<b>Total Budget for Activity</b>	\$367,322.00	
<b>Performance Measures</b>	We expect four homes to be developed under this activity.	
<b>Projected Start Date</b>	5/1/2011	
<b>Projected End Date</b>	4/30/2014	
<b>Responsible Organization</b>	<b>Name</b>	Hamilton County Community Development
	<b>Location</b>	138 E. Court Street, Suite 1002

		Cincinnati, OH 45202
	<b>Administrator Contact Info</b>	Susan Walsh (513) 946-8235 Susan.Walsh@hamilton-co.org

<b>Activity Number 3</b>									
<b>Activity Name</b>	Demolition of residential and commercial property								
<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>	CDBG eligible activity 24 CFR 570.201(d)								
<b>National Objective</b>	Low Moderate Middle Income Area Benefit (LMMA)								
<b>Activity Description</b>	<p>Blighted structures that are vacant and abandoned will be demolished under this activity. Only structures located in low/mod/middle income areas, that meet the definition of blighted, and are not candidates for rehab, will be eligible for demolition. This activity will have the benefit of improving the neighborhood in which it is located, by removing the blighting influence, and stabilizing property values in the area. Demolition funds will be provided in the form of a grant to the community, with the expectation that a lien, representing the cost of the demolition, be placed on the property. The lien would be repaid to the county at a point in the future when the property is transferred.</p> <p>The County will provide, to the maximum extent possible, for the hiring of individuals and small businesses that are owned/operated by persons residing in the vicinity of NSP3 projects, with vicinity defined as Hamilton County. This includes, but is not limited to, updating procurement procedures to incorporate preferences for vicinity hiring and specifying in developer contracts the requirement to reach out to local individuals and businesses when hiring or contracting opportunities arise. Local, state, and federal procurement procedures will still be followed.</p>								
<b>Location Description</b>	This activity will occur within the Village of Lincoln Heights, Ohio (census tract 227.00).								
<b>Budget</b>	<table border="1"> <thead> <tr> <th><b>Source of Funding</b></th> <th><b>Dollar Amount</b></th> </tr> </thead> <tbody> <tr> <td>NSP3</td> <td>\$\$75,000.00</td> </tr> <tr> <td>(Other funding source)</td> <td>\$</td> </tr> <tr> <td>(Other funding source)</td> <td>\$</td> </tr> </tbody> </table>	<b>Source of Funding</b>	<b>Dollar Amount</b>	NSP3	\$\$75,000.00	(Other funding source)	\$	(Other funding source)	\$
<b>Source of Funding</b>	<b>Dollar Amount</b>								
NSP3	\$\$75,000.00								
(Other funding source)	\$								
(Other funding source)	\$								
<b>Total Budget for Activity</b>	\$75,000.00								
<b>Performance Measures</b>	We expect 13 properties to be demolished (at an average cost of \$6,000 per structure).								
<b>Projected Start Date</b>	5/1/2011								

<b>Projected End Date</b>	4/30/2014	
<b>Responsible Organization</b>	<b>Name</b>	Hamilton County Community Development
	<b>Location</b>	138 E. Court Street, Suite 1002 Cincinnati, OH 45202
	<b>Administrator Contact Info</b>	Susan Walsh (513) 946-8235 Susan.Walsh@hamilton-co.org

<b>Activity Number 4</b>		
<b>Activity Name</b>	Land Banking	
<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 checked="" 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>	CDBG eligible activity 24 CFR 570.201 (a) and (b)	
<b>National Objective</b>	Low Moderate Middle Income Area Benefit (LMMA)	
<b>Activity Description</b>	This activity will involve the acquisition, management, and/or disposition of residential properties that have been foreclosed upon, including activity delivery costs. The official county land bank is not yet formed; it is expected to be created early on in the term of the NSP grant, but in the event the land bank does not come to fruition or is finalized at a point that does not allow us to meet expenditure deadlines, the funds allocated to this activity will be moved to Activities 1, 2, and/or 3.	
<b>Location Description</b>	This activity will occur within our target areas in the City of North College Hill, Ohio and the Village of Lincoln Heights, Ohio.	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$\$200,000.00
	(Other funding source)	\$
	(Other funding source)	\$
<b>Total Budget for Activity</b>	\$200,000.00	
<b>Performance Measures</b>	We expect five homes to be acquired for the land bank, with costs varying, depending on demolition and maintenance.	
<b>Projected Start Date</b>	5/1/2011	
<b>Projected End Date</b>	4/30/2014	
<b>Responsible Organization</b>	<b>Name</b>	Hamilton County Community Development
	<b>Location</b>	138 E. Court Street, Suite 1002 Cincinnati, OH 45202
	<b>Administrator Contact Info</b>	Susan Walsh (513) 946-8235 Susan.Walsh@hamilton-co.org

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>	CDBG eligible activity 24 CFR 570.206	
<b>National Objective</b>	Not applicable	
<b>Activity Description</b>	This activity involves administration of the NSP3 program. Administration began in October 2010, and eligible pre-award costs from this time to the start of the grant, will be reimbursed. Administration will extend at least until the expiration of the program in early 2014.	
<b>Location Description</b>	Not applicable	
<b>Budget</b>	<b>Source of Funding</b>	<b>Dollar Amount</b>
	NSP3	\$\$146,920.00
	(Other funding source)	\$
	(Other funding source)	\$
<b>Total Budget for Activity</b>	\$146,920.00	
<b>Performance Measures</b>	Not applicable	
<b>Projected Start Date</b>	10/1/2010	
<b>Projected End Date</b>	4/30/2014	
<b>Responsible Organization</b>	<b>Name</b>	Hamilton County Community Development
	<b>Location</b>	138 E. Court Street, Suite 1002 Cincinnati, OH 45202
	<b>Administrator Contact Info</b>	Susan Walsh (513) 946-8235 Susan.Walsh@hamilton-co.org

## 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.

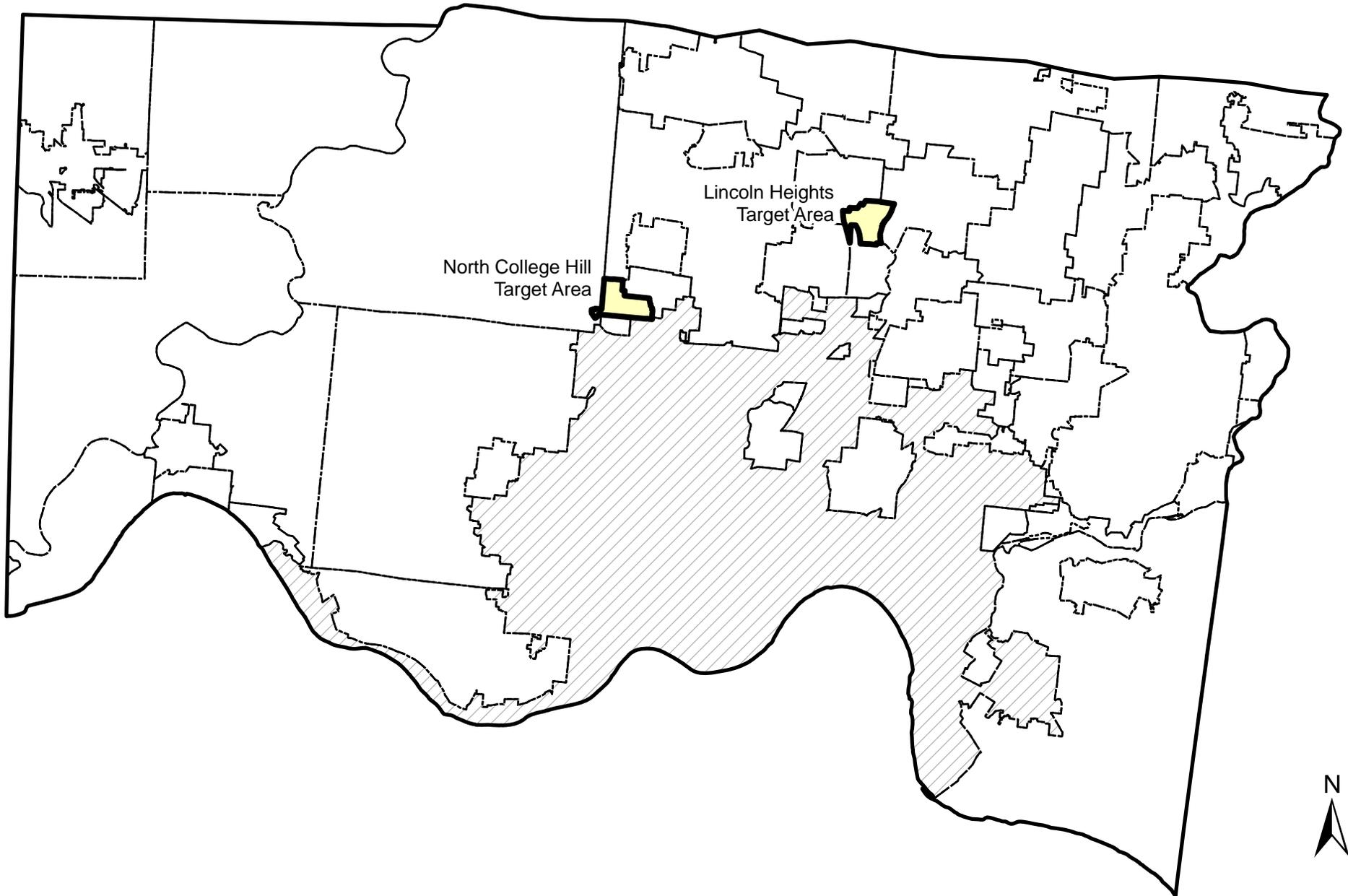
(16) **Vicinity hiring.** The jurisdiction certifies that it will, to the maximum extent feasible, provide for hiring of employees that reside in the vicinity of NSP3 funded projects or contract with small businesses that are owned and operated by persons residing in the vicinity of NSP3 projects.

(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.

Christine Synn  
Signature/Authorized Official

2/23/11  
Date

Interim County Administrator  
Title



## NSP-3 Target Areas

Hamilton County Department of Community Development  
January, 2011

### Legend

-  NSP-3 target areas
-  jurisdiction boundary
-  City of Cincinnati



Neighborhood ID: 5492584

### **NSP3 Planning Data**

Grantee ID: 3906100C

Grantee State: OH

Grantee Name: HAMILTON COUNTY

Grantee Address: 138 E. Court St. Cincinnati Ohio 45202

Grantee Email: bethany.hahn@hamilton-co.org

Neighborhood Name: NCH- 218.02 plus Goodman-FINAL

Date:2011-01-31 00:00:00

#### NSP3 Score

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

Neighborhood NSP3 Score: 17.85

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 1618

#### Area Benefit Eligibility

Percent Persons Less than 120% AMI: 81.86

Percent Persons Less than 80% AMI: 52.57

#### Neighborhood Attributes (Estimates)

##### *Vacancy Estimate*

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

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

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

USPS Residential Addresses in Neighborhood: 1603

Residential Addresses Vacant 90 or more days (USPS, March 2010): 97

Residential Addresses NoStat (USPS, March 2010): 0

### *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: 567

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 35

Percent of Housing Units 90 or more days delinquent or in foreclosure: 9.9

Number of Foreclosure Starts in past year: 40

Number of Housing Units Real Estate Owned July 2009 to June 2010: 24

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): 7

### 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): -4.6

Place (if place over 20,000) or county unemployment rate June 2005<sup>\*</sup>: 5.3

Place (if place over 20,000) or county unemployment rate June 2010<sup>\*</sup>: 9.4

<sup>\*</sup>Bureau of Labor Statistics Local Area Unemployment Statistics

### Market Analysis:

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

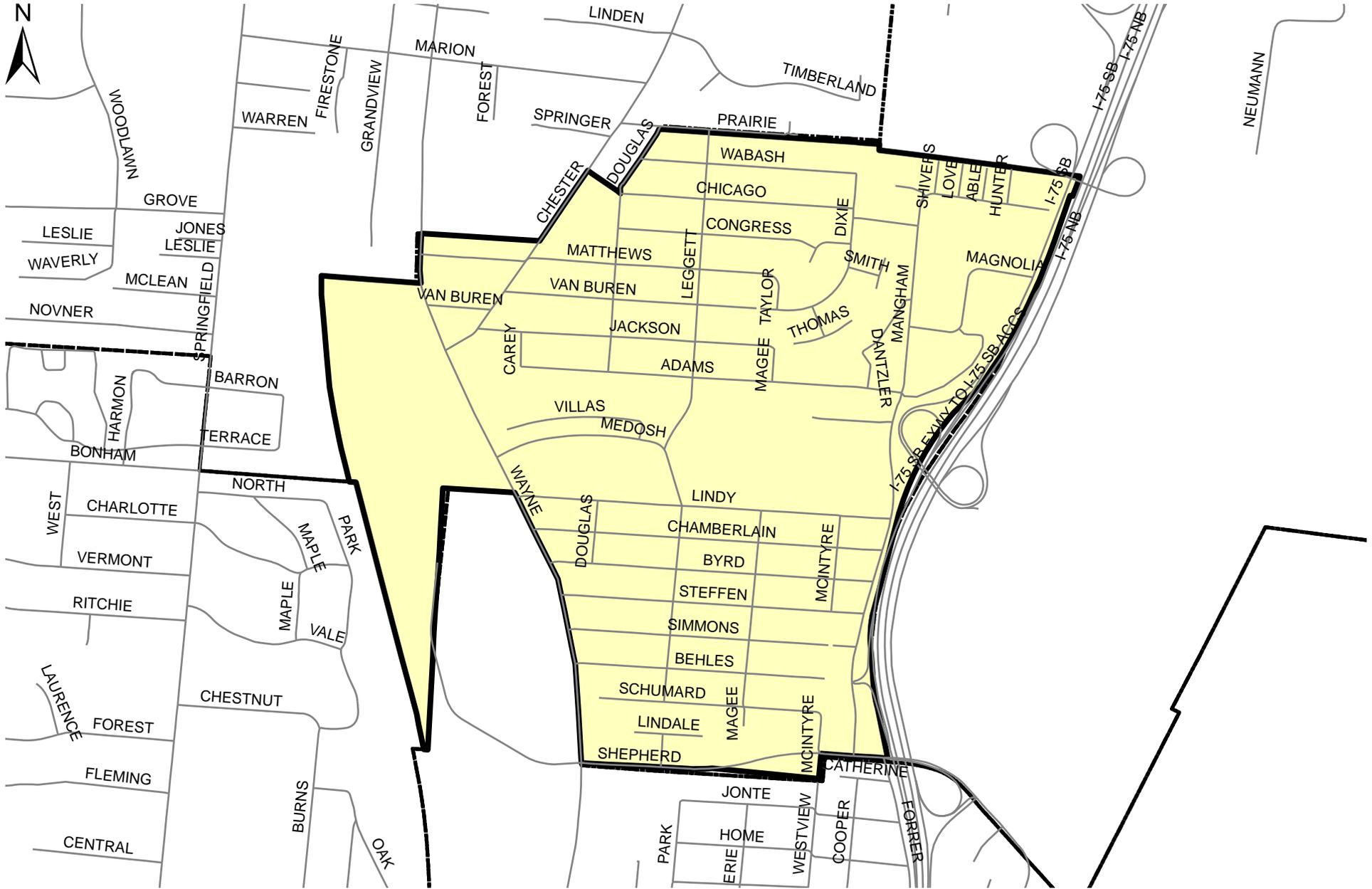
1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values,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

### Latitude and Longitude of corner points

-84.568462 39.222280 -84.560566 39.222147 -84.560738 39.218689 -84.559793 39.218689 -84.559793  
39.216827 -84.549451 39.216196 -84.548936 39.214500 -84.547777 39.209911 -84.547906 39.209246  
-84.556704 39.209479 -84.557176 39.209712 -84.562755 39.209911 -84.569407 39.210377 -84.572110  
39.209213 -84.573483 39.210576 -84.573483 39.212106 -84.569321 39.212239

Blocks Comprising Target Neighborhood

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**Lincoln Heights NSP-3 Target Area**  
 Hamilton County Department of Community Development  
 January, 2011

**Legend**

-  streets
-  jurisdiction boundary
-  NSP-3 target areas
-  City of Cincinnati

Neighborhood ID: 7005126

### **NSP3 Planning Data**

Grantee ID: 3906100C

Grantee State: OH

Grantee Name: HAMILTON COUNTY

Grantee Address: 138 E. Court St. Cincinnati Ohio 45202

Grantee Email: bethany.hahn@hamilton-co.org

Neighborhood Name: Lincoln Heights- Census Tract 227

Date:2010-11-12 00:00:00

#### NSP3 Score

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

Neighborhood NSP3 Score: 20

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 1922

#### Area Benefit Eligibility

Percent Persons Less than 120% AMI: 87.18

Percent Persons Less than 80% AMI: 70.69

#### 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: 1878

Residential Addresses Vacant 90 or more days (USPS, March 2010): 373

Residential Addresses NoStat (USPS, March 2010): 13

### *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: 245

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 55.5

Percent of Housing Units 90 or more days delinquent or in foreclosure: 13.5

Number of Foreclosure Starts in past year: 23

Number of Housing Units Real Estate Owned July 2009 to June 2010: 15

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): 5

### 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): -4.6

Place (if place over 20,000) or county unemployment rate June 2005\*: 5.3

Place (if place over 20,000) or county unemployment rate June 2010\*: 9.4

\*Bureau of Labor Statistics Local Area Unemployment Statistics

### Market Analysis:

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

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

### Latitude and Longitude of corner points

-84.457827 39.249936 -84.451389 39.250068 -84.449759 39.249337 -84.445896 39.249204 -84.451389  
39.239832 -84.451733 39.238236 -84.450960 39.235843 -84.452591 39.235843 -84.452934 39.235178  
-84.459887 39.235444 -84.460058 39.237638 -84.460230 39.238835 -84.461775 39.241494 -84.463835  
39.241560 -84.464178 39.235777 -84.467525 39.246147 -84.464521 39.246014 -84.464693 39.247476  
-84.461260 39.247410 -84.459629 39.249071 -84.458942 39.248606

Blocks Comprising Target Neighborhood

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