

THE NSP SUBSTANTIAL AMENDMENT

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| Jurisdiction(s): Butler County, Ohio <i>(identify lead entity in case of joint agreements)</i> | NSP Contact Person: Donna D. Everson |
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A. AREAS OF GREATEST NEED

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

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

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

Response:

Butler County decided on the greatest areas of need based on the data submitted by HUD. The data, contained within an excel spreadsheet, indicated the low-moderate-middle income area information and Estimated foreclosure abandonment risk score by census tract and block group. From that information, three maps were created: one map indicating which areas met the 120% LMI, one map showing those with the highest Estimated foreclosure abandonment risk score (10-8), and the final map showing the overlay of the two maps. The third map, which shows the areas which are eligible under the NSP program and have the highest risk scores indicates the areas Butler County will target with NSP funds. These areas include the Cities of Trenton and Fairfield, the Village of New Miami, and the townships of Hanover, Lemon, Madison and St. Clair. Section 3 of this Amendment provides the maps which determines the areas of greatest need.

B. DISTRIBUTION AND USES OF FUNDS

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

Response:

The distribution of funds will only be to the targeted areas, as determined by the NSP map. These areas include the Cities of Trenton and Fairfield, the Village of New Miami, and the townships of Hanover, Lemon, Madison and St. Clair. Because the Estimated foreclosure and abandonment risk score takes into account the areas of highest foreclosures, subprime mortgages, and face a significant rise in the rate of home foreclosures, we will be targeting the areas of greatest need. The areas of the highest Estimated foreclosure and abandonment risk score was used to create the target areas, therefore meeting the requirements of Section 2301(c)(2).

C. DEFINITIONS AND DESCRIPTIONS

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

Response:

Butler County will adhere to the State Definition of Blight, under ORC 1.08:

As used in the Revised Code:

(A) “Blighted area” and “slum” mean an area in which at least seventy per cent of the parcels are blighted parcels and those blighted parcels substantially impair or arrest the sound growth of the state or a political subdivision 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.

(B) “Blighted parcel” means either of the following:

(1) A parcel that has one or more of the following conditions:

(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;

(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;

(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.

(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:

(a) Dilapidation and deterioration;

(b) Age and obsolescence;

(c) Inadequate provision for ventilation, light, air, sanitation, or open spaces;

(d) Unsafe and unsanitary conditions;

(e) Hazards that endanger lives or properties by fire or other causes;

(f) Noncompliance with building, housing, or other codes;

(g) Nonworking or disconnected utilities;

(h) Is vacant or contains an abandoned structure;

(i) Excessive dwelling unit density;

(j) Is located in an area of defective or inadequate street layout;

(k) Overcrowding of buildings on the land;

(l) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness;

(m) Vermin infestation;

(n) Extensive damage or destruction caused by a major disaster when the damage has not been remediated within a reasonable time;

(o) Identified hazards to health and safety that are conducive to ill health, transmission of disease, juvenile delinquency, or crime;

(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.

(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.

(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.

(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.

Effective Date: 2007 SB7 10-10-2007

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

Response:

Affordable rent will be considered that which does not exceed 30% of a household net monthly income.

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

Response:

Continued affordability for NSP assisted housing will be monitored by Butler County Community Development and contracted agents given the task to do so. In addition, deed restrictions will be placed on the property to ensure compliance is maintained.

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

Response:

The housing rehabilitation standards will concur with those administered through Butler County’s CDBG and HOME programs, ensuring all federal, state, and local housing and building codes are followed.

D. LOW INCOME TARGETING

Identify the estimated amount of funds appropriated or otherwise made available under the NSP to be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income: **\$ 1,053,500** .

Note: At least 25% of funds must be used for housing individuals and families whose incomes do not exceed 50 percent of area median income.

Response:

It is through the Acquisition / Rehabilitation activity that the County intends to meet the 25% requirement to benefit those below 50% AMI. This can be achieved through two possibilities: 1- Partnering with agencies who work with the MRDD clientele and the senior population, acquiring a housing unit, rehabilitating the unit to be used as a group home and/or assisted living quarters. 2- In conjunction with the Shelter + Care program, locate properties within areas close to services for the clientele served through the existing program. Units will be purchased, rehabilitated, then provided to an entity participating in the Shelter + Care Program for rental units.

E. ACQUISITIONS & RELOCATION

Indicate whether grantee intends to demolish or convert any low- and moderate-income dwelling units (i.e., $\leq 80\%$ of area median income).

If so, include:

- The number of low- and moderate-income dwelling units—i.e., $\leq 80\%$ of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.
- The number of NSP affordable housing units made available to low- , moderate-, and middle-income households—i.e., $\leq 120\%$ of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.

Response:

- **There will be demolition of approximately 50 vacant and abandoned buildings which are beyond repair.**
- **Approximately 8 homes will be acquired and rehabilitated, then sold to families who meet the income guidelines of the NSP Program; those between 50% and 120% AMI.**
- **10 homes / families will be assisted through financing mechanisms, then continued through a revolving account for additional homes/families to be assisted, those between 50% and 120% AMI..**
- **Approximately 7 housing units will be made available to the population below the 50%AMI, through the Acquisition / Rehabilitation Program.**

F. PUBLIC COMMENT

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

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

Response:

The Notice of Substantial Amendment was published in the Journal News on November 7, 2008, with a Comment Period from November 7 – 21, 2008.

The notice was posted on the Butler County website, with a link to the following information:

- **Amendment**
- **Comment Form**
- **Income Limits**
- **NSP Map**

In addition, a public hearing was held on October 20, 2008. Discussion commenced between the Community Development Director, the County Recorder, the Board of Commissioners, and a local "Foreclosure / OREA Specialist" banking official.

Public comments are included as part of this Amendment in Section 4.

Evidence of Citizen Participation is also included as part of this Amendment in Section 4.

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

(1) Activity Name: **ACQUISITION / REHABILITATION**

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

NSP: (B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties.

CDBG: 570.201 (a) Acquisition and 570.202, eligible rehabilitation and preservation activities for homes and other residential structures.

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

All beneficiaries will be qualified as low-moderate-middle income, as required for the NSP Program.

(4) Activity Description:

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

Butler County will seek units in the targeted areas as indicated on the NSP map. These areas include the Cities of Trenton and Fairfield, the Village of New Miami, and the townships of Hanover, Lemon, Madison and St. Clair. Subject properties will be those that require minimal rehabilitation work. Butler County sets its rehabilitation threshold at \$25,000 and will continue that threshold into the NSP program.

It is through the Acquisition / Rehabilitation activity that the County intends to meet the 25% requirement to benefit those below 50% AMI. This can be achieved through two possibilities: 1- Partnering with agencies who work with the MRDD clientele and the senior population, acquiring a housing unit, rehabilitating the unit to be used as a group home and/or assisted living quarters. 2- In conjunction with the Shelter + Care program, locate properties within areas close to services for the clientele served through the existing program. Units will be purchased, rehabilitated, then provided to an entity participating in the Shelter + Care Program for rental units.

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

No specific addresses are known at this time.

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

**7 housing units to be acquired, rehabilitated and resold for those below 50% AMI.
8 housing units to be acquired, rehabilitated and resold for those 50 - 120% AMI.**

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

| | |
|--------------------|----------------------|
| \$1,053,500 | <50% AMI |
| \$1,046,500 | 50 – 120% AMI |
| \$2,100,000 | Total Budget |

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

**Butler County Community Development
130 High Street, Hamilton, OH 45011
Donna D. Everson, Community Development Director
(513) 785-5391**

Additional partners will be utilized for a variety of functions, which are yet to be determined.

(9) Projected Start Date:

January 2009

(10) Projected End Date:

July 2013

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

The discount rate will be a minimum of 5% below appraised value.

For financing activities, include:

- range of interest rates

No financing mechanisms will be used for this activity. The potential homeowner will purchase the home from Butler County, or a designated non-profit, through conventional banking.

For housing related activities, include:

- duration or term of assistance;

The term of assistance would be the period of acquiring the property, rehabilitating it, then selling.

- tenure of beneficiaries--rental or homeownership;

Tenure of beneficiaries is the duration of homeownership for single family occupancy. The tenure of beneficiaries for the rental portion would be the time in which the client participates in the Shelter + Care Program.

- a description of how the design of the activity will ensure continued affordability
There will be a deed restriction on the property to maintain in the residence for a period consistent with 24 CFR 92.252 and 92.254, the Affordability Period requirements of the HOME program.

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

(1) Activity Name: FINANCING

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

NSP: (A) Establish financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-seconds, loan loss reserves, and shared-equity loans for low-and-moderate income homebuyers.

CDBG: 570.201 (a) Acquisition and (n) Direct homeownership assistance..

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

All beneficiaries will be qualified as low-moderate-middle income, as required for the NSP Program.

(4) Activity Description:

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

Butler County will seek to assist those families and residences located in the targeted areas as indicated on the NSP map. These areas include the Cities of Trenton and Fairfield, the Village of New Miami, and the townships of Hanover, Lemon, Madison and St. Clair. The targeted population will be between 50% - 120% of the area median income.

The intent of this activity is to avoid the displacement of families going through foreclosure or recently completed a foreclosure. If a family is going through foreclosure, they will be required to transfer the property back to the bank, as indicated in the definition of *Foreclosed* in the Federal Register. According to the definition of *Foreclosed*, "...HUD generally will not consider a foreclosure to be complete until the title for the property has been transferred from the former homeowner under some type of foreclosure proceeding *or transfer in lieu of foreclosure*, in accordance with state or local law.

This activity will be implemented through the following steps:

- 1. The homeowner will transfer the property back to the bank.**
- 2. Butler County will purchase the property from the bank at 5% below appraised value.**
- 3. A partner agency will work with the homeowner to obtain secure, sound financing.**
- 4. The homeowner will purchase the home back from Butler County.**

For those homeowners who have recently lost their home to foreclosure, the following will be the process of this activity:

- 1. Butler County will purchase the home from the bank.**
- 2. A partner agency will work with the former homeowner to obtain secure, sound financing.**
- 3. The homeowner will purchase their home back from Butler County.**

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

No specific addresses are known at this time.

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

Initially, 10 Families / Housing units at 50-120% area median income. However, this activity will be revolving, so an indefinite number of families can be assisted.

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

\$1,200,000

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

**Butler County Community Development will be the lead entity
130 High Street, Hamilton, OH 45011
Donna D. Everson, Community Director
(513) 785-5391**

**Neighborhood Housing Services of Hamilton, Inc. *anticipated*
100 S. MLK Blvd, Hamilton, OH 45011
Lorie Batdorf, Executive Director
(513) 737-9301**

(9) Projected Start Date:

January 2009

(10) Projected End Date:

July 2013

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

The discount rate will be a minimum of 5% below appraised value.

For financing activities, include:

- range of interest rates

The potential homeowner will purchase the home from Butler County, or a designated non-profit, through conventional banking.

For housing related activities, include:

- duration or term of assistance;

The term of assistance would be the period of acquiring the property, then selling back to previous homeowner.

- tenure of beneficiaries--rental or homeownership;

Tenure of beneficiaries is the duration of homeownership.

- a description of how the design of the activity will ensure continued affordability
There will be a deed restriction on the property to maintain in the residence for a period consistent with 24 CFR 92.252 and 92.254, the Affordability Period requirements of the HOME program.

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

(1) Activity Name: **DEMOLITION**

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

NSP: (D) Demolish blighted structures.

CDBG: 570.201 (a) Acquisition and (d) Clearance for blighted structures only.

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

Properties will be located within the targeted NSP areas, benefiting low, moderate, and middle income areas at below 120% of area median income.

(4) Activity Description:

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

Butler County will acquire blighted properties and have them demolished. Depending on the property location and what is best for the community, the following options will be considered:

- 1. Divide the parcel into two. Sell or donate the divided parcel to adjacent homeowners.**
- 2. If there are several blighted structures contiguous to each other, combine the lots to make a decent piece of property for a new housing unit.**
- 3. Coordinate with an eligible family (those below 120% area median income) to build a home on the property. The property would be donated to a family as an incentive to build a new home. The homeowner would be responsible for conventional financing to build the home.**

It is not anticipated that any units will be constructed for those below the 50% area median income. Potential beneficiaries would have to obtain financing outside the scope of the NSP Program, through conventional banking. Therefore, it is highly unlikely that those below 50% of area median income would be able to obtain financing for new home construction.

The number of housing units that will be built as a result of the demolition is difficult to determine. Whatever option is best for the community will be

determined on a case by case basis (ie: split, combination, one for one replacement). However, for the purpose of this amendment, Butler County anticipates 20 homes to be constructed as a result of the demolition activity.

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

No specific addresses are known at this time.

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

50 homes to be demolished within areas below 120% area median income.

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

\$500,000

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

**Butler County Community Development will be the lead entity
130 High Street, Hamilton, OH 45011
Donna D. Everson, Community Development Director
(513) 785-5391**

(9) Projected Start Date:

January 2009

(10) Projected End Date:

July 2013

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

The discount rate will be a minimum of 5% below appraised value.

For financing activities, include:

- range of interest rates

No financing mechanisms will be used for this activity. Property may be sold to adjacent property owners.

For housing related activities, include:

- duration or term of assistance;

The term of assistance would be the period of acquiring the property, demolishing it, then selling or donating the property to adjacent property owners or new homeowners.

- tenure of beneficiaries--rental or homeownership;

Tenure of beneficiaries is the duration of homeownership.

- a description of how the design of the activity will ensure continued affordability
If required for demolition, there will be a deed restriction on the property to maintain in the residence for a period consistent with 24 CFR 92.252 and 92.254, the Affordability Period requirements of the HOME program.

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

(1) Activity Name: COUNSELING

Counseling will be provided to those benefiting from the NSP program, as required by the federal regulations:

The grantee must require each NSP-assisted homebuyer to receive and complete at least 8 hours of homebuyer counseling from a HUD-approved housing counseling agency before obtaining a mortgage loan.

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

NSP: (A) Establish financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-second, loan loss reserves, and shared-equity loans for low-and-moderate income homebuyers.

NSP: (B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties.

CDBG: 570.201 (e) Public services for housing counseling, but only to the extent that counseling beneficiaries are limited to prospective purchasers or tenants of the redeveloped properties.

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

All beneficiaries will be qualified as low-moderate-middle income, as required for the NSP Program.

(4) Activity Description:

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

The counseling services will be provided in conjunction with the Acquisition / Rehabilitation and Financing Activities.

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

No specific addresses are known at this time.

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

See Acquisition / Rehabilitation and Financing activities.

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

\$10,000

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

To be determined.

(9) Projected Start Date:

January 2009

(10) Projected End Date:

July 2013

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

For financing activities, include:

- range of interest rates

For housing related activities, include:

- duration or term of assistance;
- tenure of beneficiaries--rental or homeownership;
- a description of how the design of the activity will ensure continued affordability

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

(1) Activity Name: **ADMINISTRATION**

Administration expenses to implement the NSP program, as required by the federal regulations:

HUD is providing an alternative requirement that an amount of up to 10 percent of an NSP grant provided to a jurisdiction and of up to 10 percent of program income earned may be used for general administration and planning activities as those are defined at 24 CFR 570.205 and 206.

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

N/A

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

N/A

(4) Activity Description:

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

Planning and administration costs associated with the implementation of the NSP Program.

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

N/A

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

N/A

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

\$403,742

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

**Butler County Community Development
130 High Street, Hamilton, OH 45011
Donna D. Everson, Community Development Director
(513) 785-5391**

(9) Projected Start Date:

January 2009

(10) Projected End Date:

July 2013

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

For financing activities, include:

- range of interest rates

For housing related activities, include:

- duration or term of assistance;
- tenure of beneficiaries--rental or homeownership;
- a description of how the design of the activity will ensure continued affordability