

THE NSP SUBSTANTIAL AMENDMENT

DRAFT

Jurisdiction(s): City Of Canton, Ohio

(identify lead entity in case of joint agreements)

Jurisdiction Web Address:

- www.cantonohio.gov

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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:

Canton, Ohio, Home of the Football hall of fame, President McKinley and the First Ladies National Historic Site, is rich in historic architecture and is highly served in the areas higher education, roadway and rail. As recent as 1990, Canton's population was

over 84,000 (City of Canton, Ohio: Demographic Trends). A shift in the manufacturing industry caused a population decrease. In 2000, The US census shown that the population was 80,806 with 32,489 households and 19,785 families. With the loss of jobs from two of its major Anchors, the Timken Company and The Hoover Factory, The City of Canton's population is steadily on the decline. The 2004 census shows the population at just over 78,000.

The City's housing stock is concentrated heavily by homes built pre 1940. These homes were built to accommodate large and often extended families. The average home has square footage of 3500 and above. With the decrease in family size today, these homes were often converted to multifamily units saturating the city with rental properties. These units represent a challenge across the city as it resulted in an influx in vacancies. The rise in utility costs and a failing real estate market added to the already high abandonment numbers. With 12 neighborhoods, (Wells, Summit, West Park, Ridgewood, Harter Heights, Ridgewood, Crystal Park, Belden, Washington, Laythrop, Market Heights and Eastpointe) the community continues to fight against the decline in housing stock as vacancies, dilapidation, crime and foreclosure continues to plague the city.

The foreclosure crisis hit the City of Canton very hard. The city ranked number 7 in the state. With an estimated 40,000 parcels, Canton has over 2800 foreclosures and over 2800 vacant and abandoned properties. Over 10% of the City's housing stock is affected by vacant, abandoned and foreclosed properties. This represents an apparent need for revitalization and innovative strategy to address the issues at hand.

The City of Canton has four main goals in implementing the Neighborhood Stabilization Program:

- Create a master plan to impel growth and reform to the City of Canton's Housing Stock.
- Rejuvenate communities by returning vacant properties to occupied structures.
- Revive foreclosed properties and restore them to taxable parcels.
- Improve the City's housing stock by contributing to the social fabric of the community by creating cohesive neighborhoods through affordable homeownership.

The City of Canton has utilized criteria determined by HUD prioritizing the area of greatest need. Using the data provided, The City of Canton used the following methodology in assessing the areas of greatest need:

- Focus on areas with greatest percentage of home foreclosures;
- Focus on areas with Highest percentage of homes financed by subprime mortgages;

- Focus on areas that is likely to face a significant rise in the rate of home foreclosures

The city has identified four (4) targeted areas (census tracts with greatest need). Focusing on a targeted approach, the city feels that this will equate to projects that have a greater visible impact on the community. These areas are described under each criterion.

NUMBERS AND PERCENTAGES OF HOME FORECLOSURES

The City of Canton used data from the Stark County Auditor's office and HUD to determine the number of foreclosures in the city limits. It also used data provided from HUD's assessment of census tracts. Over 2800 foreclosures were filed in the City of Canton from 2005 to 2007. It is estimated that 7 % of the cities parcels are in foreclosure.

The area that is most affected is the center of the city in the Near North East and North West Neighborhoods. Located in Census tract 7018, this neighborhood has a 15% vacancy rate, 19.5% foreclosure rate and a 74.5 % high cost loan rate. This census tract covers part of 3 of the City's 9 wards. This census tract will be the city's main focus. Redevelopment is paramount as the area is inundated with crime, vacant lots, abandoned homes and schools that are no longer in use. As property values decline, this area in its current state creates an area of undervalue in which economically it doesn't support the investment of rehab or new construction with out added support from its community partners. Gibbs Neighborhood, census 7005 is the number two area in foreclosure and high cost loans, North East Area, tract 7003 is the third highest area in foreclosure and high cost loans and tract 7017 Summit neighborhood, is the second highest in vacancies, will also be targeted.

Neighborhood stabilization funds will allow the city to recover from the current market stance and restore strength by reinventing economic diversity and strengthening the social fabric of its community.

18 MONTH PREDICTED FORELCOSURE RATE

Census tract data was provided to illustrate the rate of foreclosures predicted over the next 18 months. This data purports that 14 census tracts has a percentage of more than 13%. One third of the City's foreclosures are in three census tracts; 7018, 7005 and 7023. These census tracts have predicted foreclosure percentages over 18%. In evaluating this data, census tracts that are high risk and pose a great risk for future issues including vacancy. The vacancy rate data reported acts as an indicator for such. This data provides percentage rates ranging from 7% to 15%. Census tracts 7018, 7015 and 7003 have a vacancy rate range from 13.3 % to 15.1%. Identifying these areas as proposed targeted area supports NSP guidelines.

HIGH COST LOAN RATE

HUD has also provided high cost loan rate information at the census tract level. The high cost loans are proportionate to the areas suffering from foreclosure. The location of the top three census tracts are 7018, 7005 and 7023. High cost loan rates range from

68.6% to 74.5 %. In evaluation the data, the proposed targeted area is in alignment with NSP requirements.

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:

As a requirement of Section 2301(c)(2) of the Housing and Economic Recovery Act, the city is required to utilize funding in the areas with the greatest percentage of home foreclosure, the areas with the highest percentages of subprime mortgages and the area that is likely to face a rise in foreclosure.

The city will comply with the requirement of benefiting individuals and households at or below 120% of the area median income. Also 25% of the allocation will be used to benefit individuals or households below or at 50% of the area median income.

The city will use a targeted approach to address foreclosed parcels of land and properties in the areas heavily affected by the highest percentage of foreclosures, highest percentage of homes financed by subprime mortgages and in areas that are likely to face a significant rise in foreclosure. The goal will be to return vacant property to viable parcels of land, revitalize the community through redevelopment and rehabilitation and provide home ownership mechanisms to impel neighborhood growth. All recipients will receive at least eight hours of counseling as provided by HERA. To achieve these goals the city will use funds in the following areas and include administration costs:

- Land Bank-Acquisition and Demolition
- Rehabilitation
- Redevelopment
- Down Payment assistance
- Counseling

ADMINISTRATION

The city will utilize the maximum allowable for administration costs (10% of its allocation). The city will collaborate with community partners to expedite its plan. The city will work with nonprofit organizations, for profit organizations, developers, realtors, local businesses, foundations and CHDOs (Community Housing Development Organizations). The city will use these dollars to develop a comprehensive plan and

implement program activities that are conducive to neighborhood and social reform, leverage activities such as social services activities, financial literacy and home maintenance.

Section 2301(c) (3) (B) of the Housing and Economic Recovery Act allows the purchase and rehabilitation of properties that have been abandoned or foreclosed upon in order to sell, rent or redevelop.

LAND BANK-ACQUISITION AND DEMOLITION

Due to the city's abundance in vacant and abandoned property, the city determined that it could benefit from land banking. Land banking will allow the city to increase its housing values by banking land and real property for redevelopment. Creating a land bank will stimulate the community. The land bank will have the ability to acquire property in a swift manner and conduct necessary disposition of the properties involved. As acquisitions assist in determining success, land bank will act as a conduit and work closely with the Land Disposition Program and the Land Reutilization Program to achieve success. The land bank will have the ability acquire, rehab and sell; acquire, demolish and land bank; deposit and/or reserve property until the market improves, or join forces with private and or non-profit developers to stabilize or revitalize targeted areas. A land banks supports the city's strategic and stabilization plans. The exit strategy is to sell and/ or lease- purchase them to first time home buyers or individuals who have not owned within three years. This will be achieved by purchasing properties below market value in connection with a REO (real estate owned) program through the lenders. The city will seek the "maximum reasonable discount" considering carrying cost. Each purchase will be carefully negotiated and have a minimum of 5% discount per unit and 15% per portfolio. Section 301 of the URA (Uniform Relocation Act) will be adhered to. An appraisal will be obtained for each property acquired and will be no more than 60 days old. A targeted approach will assist 50% of median income and not exceed 120% of median income. 20% of the city's allocation will support this category.

REHABILITATION

The City will establish a block rehabilitation program. This program will focus on a specific community defined by need and will invest in a block that will have a significant impact on neighborhood stability. This program will focus on lead based paint requirements, code enforcement and will include design standards that will encourage and increase property values. The exit strategy is to sell and/ or lease-purchase them to first time home buyers or individuals who have not owned within three years. The rehabilitation component will include 3% down payment assistance and require a minimum of eight hours of counseling including but not limited to home maintenance and financial literacy. 20% of the City's allocation will be allocated to this category.

REDEVELOPMENT

The city will establish a redevelopment effort to address the high concentration of vacant lots. This effort will be coupled with the Land Disposition Program to recreate

lots that support the city's current need. New homes will be developed to enhance the City's current housing stock and to assist in economic diversity. The redevelopment component will include 3% down payment assistance and require a minimum of eight hours of counseling including but not limited to home maintenance and financial literacy. Eligible constituents at 50% of median will be targeted with a cap of 120% of median. This strategy will assist in stabilizing the community by encouraging investment. 50% of the City's allocation will be devoted to this category. The city will adhere to the requirement of 25% benefiting those are at 50% or below of the area median income.

C. DEFINITIONS AND DESCRIPTIONS

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

Response:

The city will utilize the definition in section 1.08 of the Ohio Revised Code:

A. "Blighted areas " and "slum" mean an area in which seventy percent 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 rents will be defined as 30% of the household's adjusted income. The City of Canton will utilize Fair Market Rents for the Canton/Massillon MSA provided by HUD.

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

Response:

The city will ensure that affordability will be met by the resale or recapture provision provided in HOME. The Housing Economic Recovery Act provides direction as to the requirements of protecting affordability. Deed restrictions and/or security instruments will be recorded to protect the integrity of HOME rules. Home rules require the property to remain affordable for no less than 10 years for a \$15,000 subsidy and 20 years for 15-40k Subsidies.

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

Response:

Housing rehabilitation standards will be adhered to in accordance with the City Building and Zoning codes as Well as the Ohio Rehabilitation Standards.

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: \$_919,641_____.

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:

The City of Canton will comply with Section 2301 (f)(3)(A)(ii) requiring 25% of the city's allocation to benefit low income families with income at 50% of the area median income. The city will utilize these funds to purchase and redevelop abandoned and foreclosed homes and expect to produce 15 new construction housing units specifically for this class.

The city will also utilize dollars rehabilitate 5 units to support the Stark County Continuum of Care program. These dollars will be used to support permanent supportive housing projects through out the city.

Affordability will be maintained through current affordability guidelines. The city will work in conjunction with HUD approved counseling agencies to identify these constituents. The counseling agency will then prepare them for homeownership by providing financial literacy courses to support home ownership.

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:

The city does not expect to convert any units with NSP funds however; the city does intend to demolish units. The city will collaborate with community partners in assisting in targeting structures eligible for demolition. These properties are expected to be vacant and in disrepair at the time of acquisition.

New housing for households earning above 50% of median

The NSP funds will allow for 18 rehabilitations and 15 new construction units for households earning up to 120% of median. 100 % of these will remain affordable.

New Housing for households earning at or below 50% of median

The NSP funds will allow for 5 rehabilitations to address the needs to homeless and 15 new construction units for individuals who are earning below 50%of median. These units will remain affordable as required by HOME guidelines.

Demolition

The city anticipates on demolishing up to 40 properties with NSP funds and work in conjunction with its current land disposition and land reutilization program. The goal is to create lot sizes that accommodate the current need for new development.

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 City of Canton assembled an ad hoc committee to develop its plan. The committee was informed of the NSP guidelines and regulations. Areas of greatest need were identified. The committee included Canton City Schools, Local Business (private and non profit), area lenders, developers, regional transit authority, chamber of commerce, realtors, neighborhood organizations and investors. It was determined that the city will create a land bank, redevelop vacant land, demolish, rehab, and provide down payment assistance. We thank them for their assistance.

A draft of the amendment will be available on the City's website 15 days before final submission. A summary of public comments on the program will be provided. Canton City Residents can comment on the plan by submitting their comments via email at housing@cantonohio.gov or to the Department of Development, Attn: Carmen West, 218 Cleveland Ave. 5th floor, Canton, Ohio 44702.

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

NSP Information by Activity

(1) Activity Name: Acquisition-Land Bank

(2) Activity Type: Acquisition of abandoned, vacant or foreclosed property

CDBG eligible use: 24 CFR 570.201 (a) Acquisition and (b) disposition.

NSP Eligible Use: Section 2301(c) (3) (B) of the Housing and Economic Recovery Act allows the purchase and rehabilitation of properties that have been abandoned or foreclosed upon in order to sell, rent or redevelop.

(3) National Objective: Program guidelines will be accepted and established and will meet the national objective of benefiting low, moderate and middle income constituents. The eligible constituents will earn 120% of median or below.

(4) Project Start Date: Projected April, 2009

- (5) Project End Date: Use of Funds-June 2009-June 2013
- (6) Responsible Organization: The Department of Development of City of Canton will be the responsible organization.

Program Administrator: Director Robert Torres, Canton City Hall, 5th Floor, 218 Cleveland Ave. SW, Canton, Ohio, 44702

Project Administrator: Deputy Director Carmen West, Canton City Hall, 5th Floor, 218 Cleveland Ave. S.W. Canton, Ohio 44702

- (7) Location Description: This property is identified in the targeted area. This activity will cover multiple acquisitions throughout the area of highest need as described in the description of use section of the application.
- (8) Activity Description: Land Banking- Four census tracts were identified as areas with the highest need providing percentages for the highest number of vacancies, the highest number of foreclosures, the highest number of subprime mortgages and the highest number of risk of foreclosure. These census tracts represent almost half of the foreclosures filed in the City of Canton. As a result of this crisis, the fabric of the community is severely compromised. Lots and real property will be acquired and reserved for future development. Demolition will occur if necessary for redevelopment plans. The land bank will work in partnership with the land disposition program and the land reutilization program. This will be a collaboration with community partners in the private and public sector. Each property will be discounted at least 15% and when it is sold to an eligible constituent at the 120% of median income level or below and will include down payment assistance.
- (9) Performance Measures: This program has not been developed and will be measured at a later date.
- (10) Budget: The budget for this activity will be 20% of the City's allocation (\$750,000).

NSP Information by Activity

- (1) Activity Name: Administration of the Neighborhood Stabilization Program
- (2) Activity Type: Administration and Planning of the Neighborhood Stabilization Program

CDBG eligible use: *24 CFR 570.206 Administration and Planning*

NSP Eligible Use: *2301 Planning*

- (3) National Objective: Administer NSP dollars for Programming that benefit low, moderate and middle income constituents.

- (4) Project Start Date: January, 2009
- (5) Project End Date: January, 2013
- (6) Responsible Organization: The Department of Development of City of Canton will be the responsible organization.

Program Administrator: Director Robert Torres , Canton City Hall, 5th Floor, 218 Cleveland Ave. SW, Canton, Ohio, 44702

Project Administrator: Deputy Director Carmen West, Canton City Hall, 5th Floor, 218 Cleveland Ave. S.W. Canton, Ohio 44702

- (7) Location Description: Administration will take place at Canton City Hall, 5th floor, 218 Cleveland Ave. S.W., Canton, Ohio 44708
- (8) Activity Description: Administering the Neighborhood Stabilization Program including but not limited to personnel and strategic planning mechanisms.
- (9) Budget: The budget for this activity will be 10% (\$367,856.00) of the total allocation plus program income.

NSP Information by Activity

- (1) Activity Name: Redevelopment and Rehabilitation of abandoned and foreclosed property for sale or rent
- (2) Activity Type: Rehabilitation and Redevelopment

CDBG eligible use: 24 CFR 570.202 Rehabilitation /Redevelopment and preservation activities for homes

24 CFR 570.202 (n) Home ownership assistance

NSP Eligible Use: *Section 2301(c) (3) (B) of the Housing and Economic Recovery Act allows the purchase and rehabilitation of properties that have been abandoned or foreclosed upon in order to sell, rent or redevelop.*

- (3) National Objective: Program guidelines will be accepted and established and will meet the national objective of benefiting low, moderate and middle income constituents. The eligible constituents will earn 120% of median or below
- (4) Project Start Date: Projected April, 2009
- (5) Project End Date: Use of Funds April 2009-June 2013
- (6) Responsible Organization: The Department of Development of City of Canton will be the responsible organization coupled with community partners identified at a later date.

Program Administrator: Director, Robert Torres, 218
Cleveland Ave. SW, Canton, Ohio, 44702

Project Administrator: Deputy Director, Carmen West, 218
Cleveland Ave. SW, Canton, Oh, 44702

- (7) Location Description: Rehabilitation and Redevelopment of properties for sale will occur in the targeted area
- (8) Activity Description: The activity will be rehabilitation and redeveloping for low, moderate and middle income buyers or lease purchase renters. This activity will occur in phases commencing in blocks where vacancy, abandonment, foreclosure or risk of foreclosure are apparent. This project is designated for first time home owners. The activities involved will produce 15 new construction units for eligible constituents at the 50% of median income level or below and 15 new construction units for up to 120% of median. This activity will also produce 5 rehabilitation units to support the continuum of care. The 50% of median activity and the continuum of care activity will satisfy the 25% allocation requirement. This activity will also produce 18 rehabilitated properties to benefit eligible constituents with income at 120% of median or below.

The program will be a homeownership program with a subsidy provided for new construction and grants for rehab. Each eligible constituent benefiting from the NSP program will receive a minimum of 8 hours of counseling. Down Payment Assistance will also be offered. Affordability will be protected through deed and restrictive covenants based on the amount of subsidy as required by HOME Rule. The subsidy is due back to the City upon the sale or change in ownership. The city will accomplish this task by collaboration with community partners in the private and public sector. The community partners will perform in many facets such as each property will be discounted at least 15%. The city's investment will leverage dollars from private developers and other projects. This dollar amount leveraged is unknown at this time.

(10) Performance Measures: It is anticipated that 30 new construction units will be developed and 22 rehabilitated properties to support the eligible constituents under the program.

(11) Budget: The budget for this activity represents 66.5% of the City's allocation (\$2,451,641)

NSP Information by Activity

- (1) Activity Name: Down Payment Assistance
- (2) Activity Type: Down Payment Assistance

CDBG eligible use: *24 CFR 570.202 (n) Home ownership assistance*

NSP Eligible Use: *Section 2301(c) (3) (A) of the Housing and Economic Recovery Act allows the establishment of financing mechanisms for purchase and redevelopment of foreclosed upon homes*

- (3) National Objective: Program guidelines will be accepted and established and will meet the national objective of benefiting low, moderate and middle income constituents. The eligible constituents will earn 120% of median or below
- (4) Project Start Date: Projected April, 2009
- (5) Project End Date: Use of Funds April 2009-June 2013
- (6) Responsible Organization: The Department of Development of City of Canton will be the responsible organization coupled with community partners identified at a later date.

Program Administrator: Director, Robert Torres, 218
Cleveland Ave. SW, Canton, Ohio, 44702

Project Administrator: Deputy Director, Carmen West, 218
Cleveland Ave. SW, Canton, Oh, 44702

- (7) Location Description: The locations will be for homes in the targeted areas.
- (8) Activity Description: This activity will provide up to \$5,000 in down payment assistance for low to moderate and middle income eligible participants.
- (9) Performance Measures: It is anticipated that 32 homes will be supported by this activity.
- (10) This activity represents 4.5% equaling to \$165,000

NSP Information by Activity

- (1) Activity Name: Home Ownership Counseling
- (2) Activity Type: Home Ownership Counseling
 - i. CDBG eligible use: *24 CFR 570.201 (k) Housing Services*
 - ii. NSP Eligible Use: *Section 2401 Counseling Resources*
- (3) National Objective: Program guidelines will be accepted and established and will meet the national objective of benefiting low, moderate and middle income constituents. The eligible constituents will earn 120% of median or below
- (4) Project Start Date: Projected April, 2009
- (5) Project End Date: Use of Funds April 2009-June 2013

- (6) **Responsible Organization:** The Department of Development of City of Canton will be the responsible organization coupled with community partners identified at a later date.
- a. **Program Administrator:** Director, Robert Torres, 218 Cleveland Ave. SW, Canton, Ohio, 44702
 - b. **Project Administrator:** Deputy Director, Carmen West, 218 Cleveland Ave. SW, Canton, Oh, 44702
- (7) **Location Description:** The locations will be for homes in the targeted areas.
- (8) **Activity Description:** This activity will provide up counseling services to all eligible participants
- (9) **Performance Measures:** all eligible participants are required to participate in this activity (55 Units)
- (10)**Budget:** This activity represents .8% of the City's allocation equating to \$33,000.

CERTIFICATIONS

- (1) **Affirmatively furthering fair housing.** The jurisdiction will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-lobbying.** The jurisdiction will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (3) **Authority of Jurisdiction.** The jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (4) **Consistency with Plan.** The housing activities to be undertaken with NSP funds are consistent with its consolidated plan, which means that NSP funds will be used to meet the congressionally identified needs of abandoned and foreclosed homes in the targeted area set forth in the grantee's substantial amendment.

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

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

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

(8) **Following Plan.** The jurisdiction is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

(9) **Use of funds in 18 months.** The jurisdiction will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008 by using, as defined in the NSP Notice, all of its grant funds within 18 months of receipt of the grant.

(10) **Use NSP funds \leq 120 of AMI.** The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.

(11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be

made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

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

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

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

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

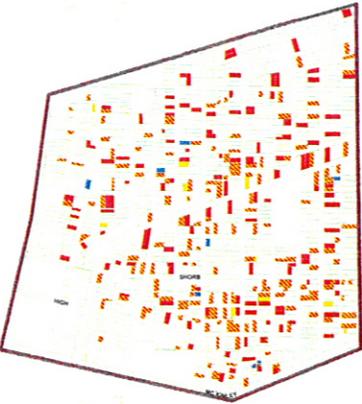
Signature/ Authorized Official

Date

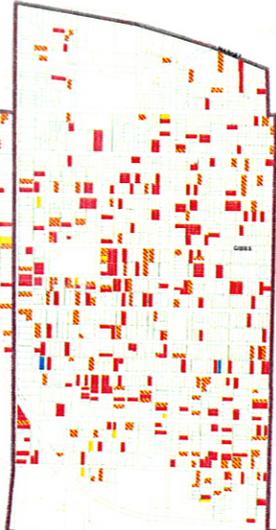
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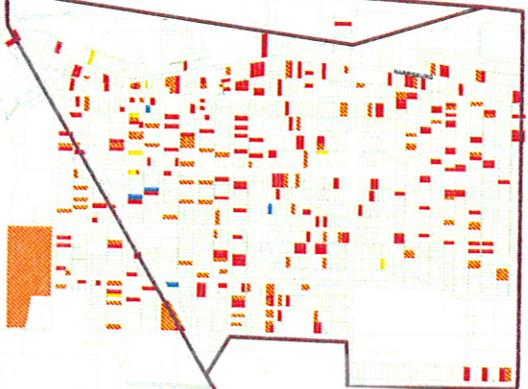
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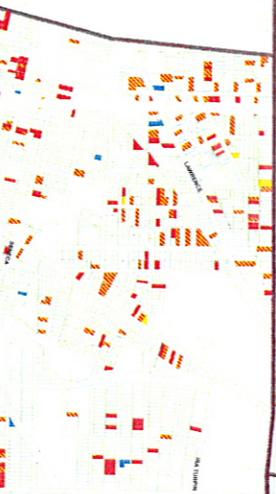
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