PUBLIC NOTICE

Citizen Review and Comment Period
February1, 2011 – February 15, 2011

Clayton County has been allocated $3,796,167. authorized under Section 1497 of the Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) of 2010 (Pub. L. 111-203, approved July 21, 2010) for emergency assistance for redevelopment of abandoned and foreclosed homes and residential properties within the County's jurisdiction.

As required by the U.S. Department of Housing and Urban Development (HUD), Clayton County must publish for citizen review and comment, its NSP 3 Substantial Amendment /Abbreviated Action Plan. This Substantial Amendment represents a common strategy supported by combined commitments and intense targeting of resources including public and private partnerships.

NSP 3 federal funds are targeted to areas of highest housing needs in the county's highest risk census tracts due to foreclosures, abandonment and blight. Areas identified by the county were confirmed through HUD's mapping tool data allowing us to draw the exact location of targeted neighborhoods. The tool also calculated the number of housing units, Neighborhood NSP3 Scores, and a minimum threshold NSP3 score for each targeted area.

Proposed NSP 3 Clayton County Selected Activities:

Activity	**Total**
Mortgage Assistance	$ 2,102,500
Loan Loss Reserves	$ 964,051.
Demolition of Blighted Structures	$ 350,000.
Planning and Administration$	$ 379,616.
Total	**$3,796,167.**

Written comments on the Clayton County NSP3 Substantial Amendment may be submitted to the address below and must be postmarked by 5:00 p.m. February 15, 2011.

For additional Information, please contact: Clayton County Housing and Community Development
Attn: NSP Manager, 1671 Adamson Parkway, Suite 101, Morrow GA 30260
Phone: 770-477-4528 email: Info@claytonnsp.com

Copies of the NSP 3 Substantial Amendment are available for review at the address above.

THE NSP 3 SUBSTANTIAL AMENDMENT

1. NSP3 GRANTEE INFORMATION

Jurisdiction:	Clayton County, GA Clayton County Housing and Community Development Program
Administrator contact:	Mickie Williams
Email:	Mickie.williams@co.clayton.ga.us
Phone:	770-477-4512
Mailing address:	1671 Adamson Parkway, Suite 101 Morrow, GA 30260

NSP3 Grant Amount Requested From HUD $3,796,167

2. AREAS OF GREATEST NEED

Clayton County's intent is to establish an effective implementation strategy plan for NSP3 by:

1) Identifying the greatest housing foreclosure needs,
2) gaining consensus and commitments from vital industry partners concerning foreclosure remedies,
3) targeting NSP3 resources in support of foreclosure remedies in designated high priority areas,
4) and insuring that expectations of the Board of Commissioners and requirements of HUD are satisfactorily met during the implementation process.

Since October, 2010, meetings were conducted with representatives of many groups, to discuss the foreclosure needs in Clayton County, and what were felt to be the best uses for NSP3 funds. Collaboration efforts involved the County Departments of Community Development, Tax Assessment, Economic Development, Sheriff, Police as well as the Office of Housing and Community Development and the Housing Authority of Clayton County. Private partners are lending institutions, including banks, GA Association of Bankers, Metro South Board of Realtors, appraisers, inspectors, builders, developers, housing counseling agencies, the local Community Housing Development Organization and other nonprofits. Based on the information gathering, several priorities take precedence . As a result, it is proposed that three activities be undertaken with the NSP 3 Grant funds:

1. **Mortgage Assistance**
2. **Loan Loss Reserves**
3. **Demolition of Blighted Properties**

The activities were selected to move Clayton toward a tipping point in housing recovery. Carefully related internet technology, education and interactive marketing resources will be critical if these activities are to succeed.

Using HUD data NSP has identified and defined two targeted areas, one in the north end of the county, named Clayton State/Rex and one in the south named Irongate/Mundys Mill. Additional target areas may be added in the future, as the goals for these areas are met or program priorities change.

1. Clayton State/Rex Target Area

This area encompasses a large portion of north Clayton County. It is bounded on the east by the county line, the north by Anvil Block road, Ft. Gilliam and Forest Parkway, on the west by Old Dixie Road, and the south by I-75 and Lake Harbin Road.

This area was chosen because of the proximity to existing and future redevelopment of Fort Gilliam, the State and National Archives and Clayton State University and the community of Rex. Housing resources contiguous to and surrounding these sites are vital to the area's economic growth and must be stabilized before conditions become worse.

This area has a HUD NSP3 score of 18.84 (must be 17-20). There are a total of 14,912 homes in the area and an estimated 630 foreclosure starts in the past year. HUD requires that NSP3 funding would need to support the sale of 127 homes to have a meaningful impact in the area.

2. Irongate /Mundys Mill Target Area

This area is in the south part of the County, and is bounded on the north by Mundys Mill Road, the west by Fitzgerald road, the south by McDonough road and the east by Tara Blvd.

This area was chosen in order to maximize the funds already being used from other sources in the area. For instance, Southern Crescent Habitat for Humanity received a grant from Wells Fargo Bank for neighborhood revitalization in the Irongate area, allowing them to help 70 existing homeowners with minor repairs and curb appeal of their homes.. Using NSP3 funds to help more buyers purchase in the area will further stabilize the community.

The area has a HUD NSP3 score of 19.75 (must be 17-20). There are a total of 5,251 homes in the area and an estimated 375 foreclosure starts last year. HUD requires that NSP3 funding would need to support the sell 75 homes to have a meaningful impact in this area.

See the maps and information generated by the HUD NSP3 Mapping Tool in the appendix to locate these target areas.

3. DEFINITIONS AND DESCRIPTIONS

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

The Clayton County Code of Ordinances does not use the term "blighted structure," but does address "Unsafe Buildings" under Article XIII Sections 18-555 and 18-556. Clayton County will use this "Unsafe Buildings" section from its Code of Ordinances as its "blighted structure" definition for the NSP:

ARTICLE XIII. UNSAFE BUILDING ABATEMENT CODE

Sec. 18-555. Applicability.

Except where general provisions contained within this article may otherwise conflict with specific provisions contained within the County Code of Ordinances, this article shall provide for a concise set of procedures to effect the elimination of unsafe buildings in a legal and timely manner in the unincorporated area of the county.
(Ord. No. 95-109, § 4, 10-3-95)

Sec. 18-556. Adoption; compliance.

Except where such general provisions may otherwise conflict with specific provisions contained within the County Code of Ordinances, the Standard Unsafe Building Abatement Code (1985 edition), as published by the Southern Building Code Congress International, Inc., and all amendments thereto, are hereby adopted by reference thereto and incorporated herein as part of the County Code of Ordinances. Accordingly, except where such general construction requirements may otherwise conflict with specific construction requirements contained within the County Code of Ordinances, all building structures or portions thereof shall be maintained and otherwise conform in all respects to the minimum standards set forth in the Standard Unsafe Building Abatement Code (1985 edition).
(Ord. No. 95-109, § 4, 10-3-95)

"Official Code of Georgia Annotated, 41-2-7:

§ 41-2-7. Power of counties and municipalities to repair, close, or demolish unfit buildings or structures; health hazards on private property; properties affected

(a) It is found and declared that in the counties and municipalities of this state there is the existence or occupancy of dwellings or other buildings or structures which are unfit for human habitation or for commercial, industrial, or business occupancy or use and not in compliance with the applicable state minimum standard codes as adopted by ordinance or operation of law or any optional building, fire, life safety, or other codes relative to the safe use of real property and real property improvements adopted by ordinance in the jurisdiction where the property is located; or general nuisance law and which constitute a hazard to the health, safety, and welfare of the people of this state; and that a public necessity exists for the repair, closing, or demolition of such dwellings, buildings, or structures. It is found and declared that in the counties and municipalities of this state where there is in existence a condition or use of real estate which renders adjacent real estate unsafe or inimical to safe human habitation, such use is dangerous and injurious to the health, safety, and welfare of the people of this state and a public necessity exists for the repair of such condition or the cessation of such use which renders the adjacent real estate unsafe or inimical to safe human habitation. Whenever the governing authority of any county or municipality of this state finds that there exist in such county or municipality dwellings, buildings, or structures which are unfit for human habitation or for commercial, industrial, or business uses due to dilapidation and not in

compliance with applicable codes; which have defects increasing the hazards of fire, accidents, or other calamities; which lack adequate ventilation, light, or sanitary facilities; or where other conditions exist rendering such dwellings, buildings, or structures unsafe or unsanitary, or dangerous or detrimental to the health, safety, or welfare, or otherwise inimical to the welfare of the residents of such county or municipality, or vacant, dilapidated dwellings, buildings, or structures in which drug crimes are being committed, power is conferred upon such county or municipality to exercise its police power to repair, close, or demolish the aforesaid dwellings, buildings, or structures in the manner provided in this Code section and Code Sections 41-2-8 through 41-2-17.

(b) All the provisions of this Code section and Code Sections 41-2-8 through 41-2-17 including method and procedure may also be applied to private property where there exists an endangerment to the public health or safety as a result of unsanitary or unsafe conditions to those persons residing or working in the vicinity. A finding by any governmental health department, health officer, or building inspector that such property is a health or safety hazard shall constitute prima-facie evidence that said property is in violation of this Code section and Code Sections 41-2-8 through 41-2-17.

(c) The exercise of the powers conferred upon counties in this Code section and in Code Sections 41-2-8 through 41-2-17 shall be limited to properties located in the unincorporated areas of such counties."

(2) Definition of "affordable rents."

Although Clayton County has no plans to use its NSP3 grant funds or NSP3 Program Income to support rental activities, for the purposes of the NSP, Clayton County defines Affordable Rents as the Fair Market Rents published annually by HUD for the Housing Choice Voucher Program [formerly known as the Section 8 Program].

(3) Ensuring continued affordability for NSP assisted housing.

Clayton County will use the HOME Program standards for continued affordability for all NSP3 assisted homes, using Promissory Notes and Deeds to Secure Debt which contain recapture clauses.

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

Clayton County will use as its NSP Rehabilitation Standards its HOME Program Property Standards, which use the Georgia Uniform Code Act [ICC building Code, National Electrical Code, etc.].

Any gut rehabilitation or new construction, if necessary, will be designed to meet the standard for Energy Star Qualified New Homes. Other rehabilitation will meet these standards to the extent applicable, such as when necessary to replace windows, doors, appliances, hot water heaters, furnaces, air conditioning units, they will be replaced with Energy Star labeled products. Water efficient toilets, showers, and faucets will be installed when those items are being replaced.

4. LOW-INCOME TARGETING

Clayton County will ensure that at least $949,042, which is 25% of the NSP3 grant award, will be spent to assist families at or below 50% of Area Median Income to purchase homes. Allocation of $952,500 in mortgage assistance for VLI buyers has been budgeted to support this group. Continuing to pursue home ownership for very low income families is one of Clayton's priorities.

NSP3 will also continue to work with Southern Crescent Habitat for Humanity in providing housing for very low income families. Given our experience in NSP1, we expect to attract buyers in this income category, especially with the incentive of mortgage assistance be available.

5. ACQUISITION AND RELOCATION

Clayton County does not intend to acquire any property with NSP3 funds that is not vacant. Any property that is demolished will be vacant and blighted.

6. PUBLIC COMMENT

The draft of the Substantial Amendment was posted on the County website and the Clayton NSP website on February 1, 2011 . The following public comments were made:

7. NSP INFORMATION BY ACTIVITY

Preferences for Rental Housing, for all activities:

In the last few years, Clayton County has had a high foreclosure rate, and has seen many of the single family homes purchased by investors and used as rental property. There are estimates that the percentage of single family housing in the County that is now rental is as high as 60% of all homes, and no one places rental homes at less than 40%. Many multifamily rental complexes in the County are impacted by this and are experiencing high vacancy rates. Rents are staying in a very affordable range, due to the volume of rental property available. Therefore, NSP3 does not see the need to create preferences for the development of affordable rental housing. We will be focusing our activities on increasing home ownership of affordable housing in the target areas.

ACTIVITY 1

Activity Name: Mortgage Assistance –Very Low Income

Eligible Use: (A) Financing Mechanisms

CDBG Activity: As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206.

National Objective: Benefitting low-and moderate income persons

Activity Description: NSP3 will provide up to $7,500 for buyers whose incomes are at or below 50% AMI. Buyers will purchase foreclosed homes or through an approved short-sale with the mortgage company. Buyers will qualify for a loan with an approved bank or mortgage company, including Southern Crescent Habitat for Humanity, to receive the mortgage assistance. All buyers will be required to take an 8 hour home buyer education class, and a 4 hour home owner training class.

Our goal is to have as many foreclosed vacant homes as possible purchased by homeowners, as too many homes have been purchased by investors and turned into rental property.

Mortgage assistance will be recorded as a soft second, with a deed to secure debt and promissory note. The assistance will have a zero interest rate, and will be recaptured if the home is sold in less than five years.

We are working with County banks in the vicinity of our two target areas to provide home loans to buyers. We do not anticipate any hiring of employees for this activity, but if any new hires are needed, those who reside in the vicinity of the target areas would be the first applicants.

Location description: Both target areas – the Clayton State/Rex target area and the Irongate/Mundys Mill target area – are eligible for this activity.

Budget: NSP3 $ 952,500

Performance Measures: 127 homebuyers will be assisted by this activity.

Projected Start Date: April, 2011 or as soon as grant funds are received.

Projected End Date: April, 2014 or three years from date grant funds are received.

Responsible Organization: Clayton County Housing and Community Development
Neighborhood Stabilization Program office
1671 Adamson Parkway, Suite 101
Morrow GA 30260

Administrator: Mickie Williams, 770-477-4512
Mickie.williams@co.clayton.ga.us

ACTIVITY 2

Activity Name: Mortgage Assistance –Moderate Income

Eligible Use: (A) Establish Financing Mechanisms

CDBG Activity: As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206.

National Objective: Benefitting low-and moderate income persons

Activity Description: NSP3 will provide up to $5,000 for buyers whose incomes are between 51% and 80% AMI. Buyers will purchase foreclosed homes or through an approved short-sale with the mortgage company. Buyers will qualify for a loan with an approved bank or mortgage company to receive the mortgage assistance. All buyers will be required to take an 8 hour home buyer education class, and a 4 hour home owner training class.

Our goal is to have as many foreclosed vacant homes as possible purchased by homeowners, as too many homes have been purchased by investors and turned into rental property.

Mortgage assistance will be recorded as a soft second, with a deed to secure debt and promissory note. The assistance will have a zero interest rate, and will be recaptured if the home is sold in less than five years.

We are working with banks in the vicinity of our two target areas to provide home loans to buyers. We do not anticipate any hiring of employees for this activity, but if any new hires are needed, those who reside in the vicinity of the target areas would be the first applicants.

Location description: Both target areas – the Clayton State/Rex target area and the Irongate/Mundys Mill target area – are eligible for this activity.

Budget: NSP3 $1,000,000

Performance Measures: 200 homebuyers will be assisted through this activity.

Projected Start Date: April, 2011 or as soon as grant funds are received.

Projected End Date: April, 2014 or three years from date grant funds are received.

Responsible Organization: Clayton County Housing and Community Development
Neighborhood Stabilization Program office
1671 Adamson Parkway, Suite 101
Morrow GA 30260

Administrator: Mickie Williams, 770-477-4512
Mickie.williams@co.clayton.ga.us

ACTIVITY 3

Activity Name: Mortgage Assistance – Middle Income

Eligible Use: (A) Establish Financing Mechanisms

CDBG Activity: As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206.

National Objective: Benefitting low-and moderate, and middle income persons

Activity Description: NSP3 will provide up to $2,000 per buyer whose incomes are between 81%-120% AMI. Buyers will purchase foreclosed homes or through an approved short-sale with the mortgage company. Buyers will qualify for a loan with an approved bank or mortgage company to receive the mortgage assistance. All buyers will be required to take an 8 hour home buyer education class, and a 4 hour home owner training class.

Our goal is to have as many foreclosed vacant homes as possible purchased by homeowners, as too many homes have been purchased by investors and turned into rental property.

Mortgage assistance will be recorded as a soft second, with a deed to secure debt and promissory note. The assistance will have a zero interest rate, and will be recaptured if the home is sold in less than five years.

We are working with banks in the vicinity of our two target areas to provide home loans to buyers. We do not anticipate any hiring of employees for this activity, but if any new hires are needed, those who reside in the vicinity of the target areas would be the first applicants.

Location description: Both target areas – the Clayton State/Rex target area and the Irongate/Mundys Mill target area – are eligible for this activity.

Budget: NSP3 $150,000

Performance Measures: 75 homebuyers will be assisted through this activity.

Projected Start Date: April, 2011 or as soon as grant funds are received.

Projected End Date: April, 2014 or three years from date grant funds are received.

Responsible Organization: Clayton County Housing and Community Development
Neighborhood Stabilization Program office
1671 Adamson Parkway, Suite 101
Morrow GA 30260

Administrator: Mickie Williams, 770-477-4512
Mickie.williams@co.clayton.ga.us

ACTIVITY 4

Activity Name: Loan Loss Reserves

Eligible Use: (A) Establish Financing Mechanisms

CDBG Activity: As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206.

National Objective: Benefitting low-and moderate income persons

Activity Description:

Loan loss reserves are funds set aside to offset losses from loans that are either in arrears or that have been declared bad debt or nonperforming loans. Banks must retain a loan loss reserve for each loan they make. The percentage each bank must reserve is determined by the regulatory agency responsible based on how the bank is chartered.

- Mortgage lenders have utilized a high percentage of FHA and VA loans and most banks have focused their efforts toward acquisition and development loans supporting new construction. Major changes in the structure of Government Sponsored Enterprises (GSEs) (Fannie Mae, Freddie Mac, etc.) may limit future activity of mortgage companies and may affect the number of home loans made.

- To encourage the 13 community banks located in Clayton County to aggressively re-enter or expand their mortgage market, NSP 3 funds would provide loan loss reserves for each mortgage loan made to a qualified buyer who purchases a foreclosed home within the County.

- The County's NSP staff would ensure that purchasers are NSP 3 eligible, homes are located within an NSP3 targeted area, and home buyers have completed the required 12 hours of home counseling prior to purchase.

- Bank regulators determine the required amount each bank must reserve based on the methodology used to estimate future defaults and losses. NSP would use this percentage to determine the amount of loan loss reserves Clayton would provide. For example, if the mortgage loan was $100,000 and the bank's reserve percent was 1%, NSP3 would provide $1,000 in loan loss reserves. The reserves would be committed for a period not to exceed 12 months or until the bank is released from its liabilities to repurchase the loan, whichever occurs first. Funds would be returned to NSP3 as program income.

- The NSP3 goal is to help reduce the existing foreclosure inventory and to secure commitments from our banking community to help stabilize the NSP 3 neighborhoods through new bank resources.

- NSP has partnered with the Georgia Bankers Association to design this new program process which will be efficient and sustainable to benefit the citizens of Clayton County. This is the first LLR in the Region and we have asked and HUD has agreed to provide direct technical assistance during design and implementation to ensure compliance.

- Low Risk: Clayton NSP will have the first right of refusal for any home going into foreclosure. Clayton, through NSP1 or NSP3 funds, can purchase any foreclosure and resell to another low or moderate income family.

We are working with County banks in the vicinity of our two target areas to provide home loans to buyers. We do not anticipate any hiring of employees for this activity, but if any new hires are needed, those who reside in the vicinity of the target areas would be the first applicants.

Location description: Both target areas – the Clayton State/Rex target area and the Irongate/Mundys Mill target area – are eligible for this activity.

Budget: NSP3 $ 964,051

Performance Measures: 964 buyers will be assisted in receiving home loans through this activity.

Projected Start Date: April, 2011 or as soon as grant funds are received.

Projected End Date: April, 2014 or three years from date grant funds are received.

Responsible Organization: Clayton County Housing and Community Development
Neighborhood Stabilization Program office
1671 Adamson Parkway, Suite 101
Morrow GA 30260

Administrator: Mickie Williams, 770-477-4512
Mickie.williams@co.clayton.ga.us

ACTIVITY 5

Activity Name: Demolition of Blighted Structures

Eligible Use: (D) Demolish Blighted Structures

CDBG Activity: 24 CFR 570.201 (d) Clearance for blighted structures only

National Objective: Prevention or elimination of Slums or Blight

Activity Description: We will work with the County Code Enforcement unit to identify blighted structures that need to be demolished due to serious code violations. This constitutes addressing slums/blight on a spot basis.

Location description: Both target areas – the Clayton State/Rex target area and the Irongate/Mundys Mill target area – are eligible for this activity.

Budget: NSP3 $ 350,000

Performance Measures: 12 properties will be demolished through this activity.

Projected Start Date: April, 2011 or as soon as grant funds are received.

Projected End Date: April, 2014 or three years from date grant funds are received.

Responsible Organization: Clayton County Housing and Community Development
Neighborhood Stabilization Program office
1671 Adamson Parkway, Suite 101
Morrow GA 30260

Administrator: Mickie Williams, 770-477-4512
Mickie.williams@co.clayton.ga.us

PROGRAM ADMINISTRATION:

Funds for program administration have been budgeted as 10% of the total NSP3 grant for an amount of $379,616.

8. 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-displacement and relocation plan.** The jurisdiction certifies that it has in effect and will follow a residential anti-displacement and relocation assistance plan.

(3) **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.

(4) **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.

(5) **Consistency with Plan**. The housing activities to be undertaken with NSP3 funds are consistent with its consolidated plan, which means that NSP3 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.

(6) **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 NSP3 program published by HUD.

(7) **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.

(8) **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.

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

(10) **Use of funds**. The jurisdiction 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% of its grant funds within 2 years and spending 100% within 3 years of receipt of the grant.

(11) **Use NSP funds ≤ 120 of AMI**. The jurisdiction will comply with the requirement that all of the NSP3 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.

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 non-violent 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 non-violent civil rights demonstrations within its jurisdiction.

(13) **Compliance with anti-discrimination laws**. The NSP3 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.

(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 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 Substantial Amendment to create preferences for the development of affordable rental housing as needed for properties assisted with NSP3 funds.

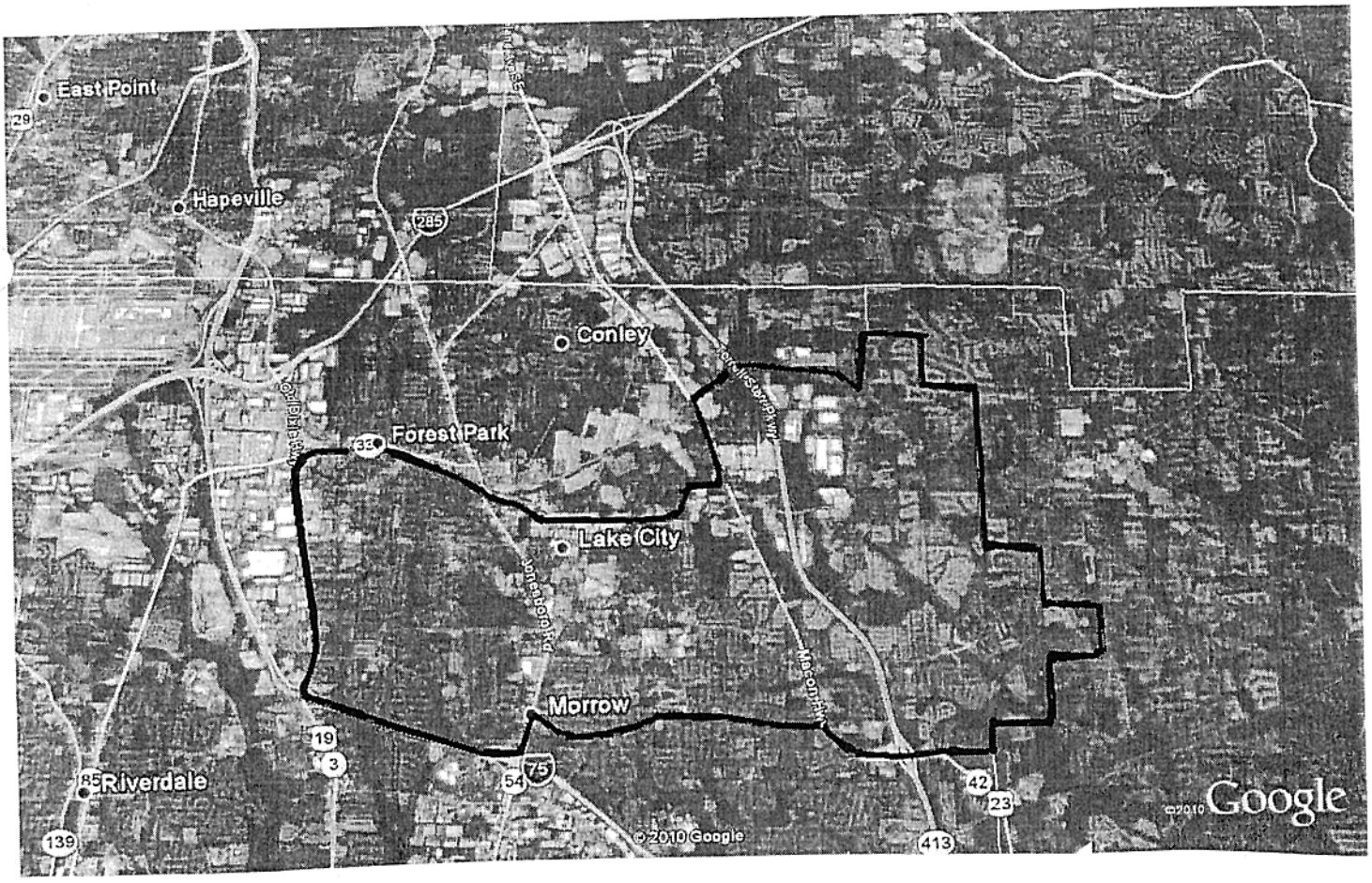
_____ _____
Signature/Authorized Official Date

_____
Title

APPENDIX

MAP OF TARGET AREA 1: CLAYTON STATE/REX

Clayton State/Rex target area is bounded on the east by the county line, the north by Anvil Block road, Ft. Gilliam and Forest Parkway, on the west by Old Dixie Road, and the south by I-75 and Lake Harbin Road.



NSP3 Planning Data

Grantee ID: 1306300C
Grantee State: GA
Grantee Name: CLAYTON COUNTY
Grantee Address:
Grantee Email: carol.seaton@co.clayton.ga.us

Neighborhood Name: Clayton state Ft Gilliam
Date:2011-01-19 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: 18.84
State Minimum Threshold NSP3 Score: 17
Total Housing Units in Neighborhood: 14912

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 78.38
Percent Persons Less than 80% AMI: 51.78

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: 19107
Residential Addresses Vacant 90 or more days (USPS, March 2010): 1149
Residential Addresses NoStat (USPS, March 2010): 1682

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: 6061
Percent of Housing Units with a high cost mortgage between 2004 and 2007: 33.93
Percent of Housing Units 90 or more days delinquent or in foreclosure: 11.78
Number of Foreclosure Starts in past year: 630
Number of Housing Units Real Estate Owned July 2009 to June 2010: 337

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): 127

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): -11.6
Place (if place over 20,000) or county unemployment rate June 2005*: 6.2
Place (if place over 20,000) or county unemployment rate June 2010*: 11.9
*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.

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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

-84.383926 33.625626 -84.381866 33.606184 -84.377575 33.591314 -84.378433 33.585022 -84.340324 33.575440 -84.339638 33.582591 -84.333458 33.579445 -84.312515 33.581733 -84.291058 33.582734 -84.287453 33.577586 -84.277496 33.577014 -84.271660 33.577014 -84.263077 33.572437 -84.262905 33.581876 -84.253979 33.582591 -84.252777 33.591028 -84.243679 33.591028 -84.243507 33.598750 -84.253807 33.598750 -84.254494 33.607185 -84.263592 33.606756 -84.262733 33.630772 -84.273033 33.631201 -84.271832 33.639633 -84.282475 33.639776 -84.282131 33.646064 -84.302731 33.633345 -84.312172 33.628342 -84.306507 33.615477 -84.328480 33.615191 -84.328480 33.611188 -84.336720 33.611617 -84.336376 33.615620 -84.341698 33.612904

Blocks Comprising Target Neighborhood

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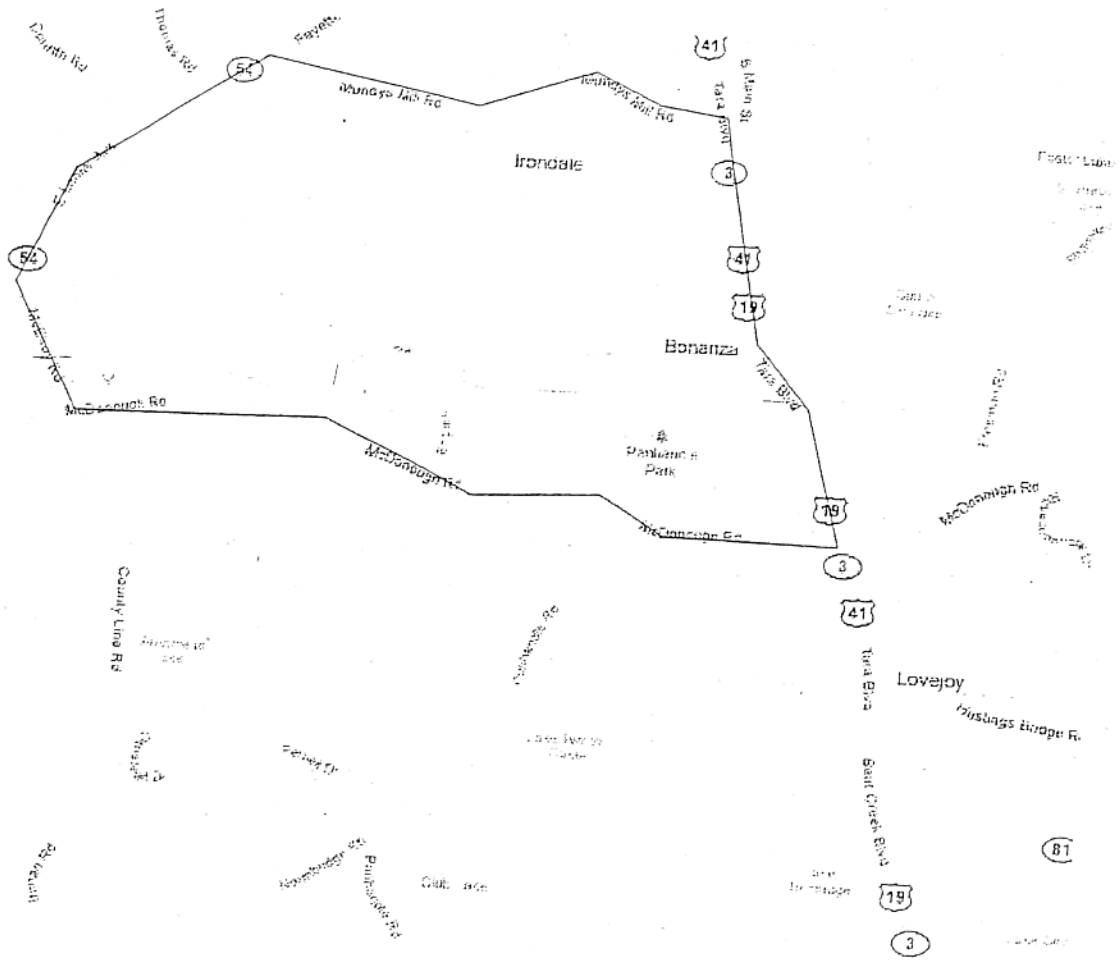
MAP OF TARGETED AREA IRONGATE/MUNDYS MILL

Irongate/Mundy Mill target area is bounded on the north by Mundy's Mill Road, the west by Highway 54, the south by McDonough road and the east by Tara Blvd.



NSP3 Planning Data

Grantee ID: 1306300C,1399990N
Grantee State: GA
Grantee Name: CLAYTON COUNTY,GA NONENTITLEMENT
Grantee Address:
Grantee Email: carol.seaton@co.clayton.ga.us

Neighborhood Name: Irongate/Mundys Mill
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: 19.81
State Minimum Threshold NSP3 Score: 17
Total Housing Units in Neighborhood: 5170

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 72.41
Percent Persons Less than 80% AMI: 40.86

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: 7024
Residential Addresses Vacant 90 or more days (USPS, March 2010): 435
Residential Addresses NoStat (USPS, March 2010): 608

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: 3102
Percent of Housing Units with a high cost mortgage between 2004 and 2007: 37.56
Percent of Housing Units 90 or more days delinquent or in foreclosure: 13.57
Number of Foreclosure Starts in past year: 373
Number of Housing Units Real Estate Owned July 2009 to June 2010: 198

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): 75

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): -11.6
Place (if place over 20,000) or county unemployment rate June 2005*: 6.13
Place (if place over 20,000) or county unemployment rate June 2010*: 11.76
*Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

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Blocks Comprising Target Neighborhood

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