

CITY OF HOUSTON

Housing & Community Development Department

Bill White

Mayor

Richard S. Celli
Director
601 Sawyer Street
Houston, Texas 77007

T. (713) 868-8300
F. (713) 868-8414
www.houstonhousing.org

February 6, 2009

Ms. Sandra H. Warren, Director
U.S. Department of Housing and Urban Development
Houston Field Office, Region VI
Office of Community Planning & Development
1301 Fannin, Suite 2200
Houston, TX 77002

Dear Ms. Warren:

In accordance with the Neighborhood Stabilization Program (NSP) requirements, the City of Houston Housing and Community Development Department (HCDD) provided the citizens of Houston several opportunities to participate in the public review process of the proposed 2008 Consolidated Action Plan amendment. A summary of the NSP amendment was republished in three local newspapers, each with city-wide circulation, and residents were encouraged to submit comments during the fifteen (15) calendar day review period which extended from January 16, 2009 through January 31, 2009. In addition, a final, detailed draft of the NSP was reposted on the Department's website for review by the public. Lastly, copies of the proposed NSP amendment were made available, free of charge, for viewing or to be mailed, if requested.

HCDD did not receive any comments or questions about the NSP.

Please accept this resubmission of the Neighborhood Stabilization Program application, which is a substantial amendment to the 2008 Consolidated Action Plan, as evidence of full compliance of the NSP requirements. Attached you will find a copy of the NSP application that was previously submitted to the HUD Houston office on December 30, 2008 along with the related materials. We look forward to hearing from you regarding the approval of the NSP.

Sincerely,

Richard S. Celli

Neighborhood Stabilization Program



***City of Houston
Housing and Community Development Department
December 2008***

TABLE OF CONTENTS

Introduction	Page 1
Areas of Greatest Need	Page 1
Distribution of Funds	Page 2
Definitions and Descriptions	Page 3
Targeted Households	Page 5
Acquisition/Relocation	Page 5
Public Comment	Page 6
NSP Program by Activity	Page 7

Attachments:

NSP Substantial Amendment Checklist

Copies of Certifications

Appendix A

Public Comment/Response

Appendix B

Published NSP Summary

Appendix C

Maps/Related Materials

INTRODUCTION

The City of Houston has prepared this Amendment to the 2008 Consolidated Action Plan, which was submitted to the U. S. Department of Housing and Urban Development (HUD) on May 2, 2008, to include the additional allocation of \$13,542,193 under Title III of the Housing and Economic Recovery Act of 2008 – Neighborhood Stabilization Program.

The Neighborhood Stabilization program (NSP) provided a total of \$3.92 billion to state and local governments to help address the effects of abandoned and foreclosed properties in the nation's communities. The City of Houston Housing and Community Development Department (HCDD) proposes to use NSP dollars to fund projects that will stabilize three targeted neighborhoods as detailed in this Amendment. The Target Zones represent those areas with the greatest need for action to address foreclosure issues and the effects of significant numbers of foreclosures on remaining homeowners in these neighborhoods. The City of Houston will fund projects that acquire and rehabilitate both lender- and tax-foreclosed properties, properties in the process of foreclosure, and abandoned properties, with the intent to place these properties back into use by low-moderate-middle income families as quickly as possible.

HCDD will accomplish this by undertaking the activities described in this Amendment. The City of Houston remains committed to its core strategy of conserving owner-occupied housing; subsidizing qualified candidates to become homebuyers; providing zero percent performance-based loans to encourage improvement of multi-family units; and leveraging federal funds with private dollars to revitalize income-eligible areas through the construction and preservation of safe, sanitary, and affordable housing units.

A summary of the NSP was published in the Houston Chronicle on November 3, 2008 and on the HCDD website. Full copies of the NSP were made available at the HCDD office at 601 Sawyer, Houston, Texas and at a public hearing held on November 12, 2008. The public was invited to comment on the application during the 15-day review period (11/4-11/18) and subsequently an additional review period of January 16, 2009 through January 31, 2009.

AREAS OF GREATEST NEED

Houston is the fourth-largest city in the nation, yet was able to offer affordably priced, attractive housing in a balanced market for many years. The City of Houston Planning and Development Department estimates that as of January 2008, Houston had a population of 2,229,199 residents. The majority of Houstonians (53.3 percent) are low and moderate-income (LMI) and most of the LMI residents are minorities. Affordability has become a housing issue in recent years. Rental rates and purchase prices have increased rapidly, therefore limiting LMI resident's ability to afford housing. This affordability squeeze, coupled with

sub-prime lending practices and increased tax delinquency among home owners, has destabilized a number of neighborhoods. Specifically, the median value of owner-occupied housing increased from \$79,300 in 2000 to \$119,400 in 2006. This increased value raises taxes by approximately 50% for the resident family. A similar level of increase in housing costs has also affected median rent, which was \$575 per month in 2000, increasing to \$729 in 2006. (Source: U.S. Census Bureau, 2006 American Community Survey).

The recent hurricanes (Katrina, Rita, and Ike) have further affected the Houston Area affordable housing supply. Numerous dwelling units were affected by the storms, and the number of households seeking alternative housing while their original homes are under repair has increased demand for housing. Houston has taken in temporary and permanent residents from neighboring counties and states impacted by the storms. Simultaneously, drastic reduction of credit availability to the home building industry has cut available supply of housing. The need or demand for affordable housing is out of balance with the supply.

To identify areas with the greatest need for the NSP, HCDD rated census tracts and zip codes based upon the number of credit and tax foreclosures, numbers of REO (real estate owned) properties by lenders, and data provided by HUD regarding risk of foreclosure and relative levels of subprime lending. HCDD used risk ratings to determine census tracts most impacted by increased foreclosure activity. The level of risk ranged from ten (10) the highest, to one (1) the lowest.

The results of HCDD's risk assessments were mapped. From this data, contiguous high risk areas were designated as Target Zones, containing the most properties scoring nine (9) or ten (10). The attached maps (1 thru 6) present the Target Zones. Within these zones, using data on foreclosure activity by zip code, HCDD calculates that during March 2008, a total of 7,584 properties were foreclosed by lenders and municipalities and 758 properties were REO. To address these areas of greatest need, NSP funds will be leveraged with private sector partners to address foreclosures, increase homeownership, and expand the stock of affordable housing while removing the blight of vacant and abandoned buildings.

A. DISTRIBUTION AND USES OF FUNDS

The City of Houston proposal meets the requirements of Section 2301 (c) (2) of the Housing and Economic Development Recovery Act (HERA). The funds must be distributed to the areas of greatest need, including those with the greatest percentage of foreclosures, the highest percentage of homes financed by sub-prime loans, and areas likely to face a significant rise in the rate of single family and multi-family foreclosures. Since the City of Houston is so large, and a majority of households are low and moderate income, the Target Zones were

developed, as described above, to focus efforts on the neighborhoods with the greatest need.

Based upon the data found in the Target Zones, HCDD has determined that the fastest response to addressing these needs will be implemented via three activities or programs to which the \$13,542,193 of NSP funds will be expended as follows:

- \$1,354,219 for administrative use
- \$3,385,549 to benefit households at or below 50% of AMI
- \$8,802,425 to benefit households at or below 120% of AMI

HCDD anticipates the following deliverable utilizing the above dollar allocations:

- 40 units of for-sale housing for low-income (<50% of AMI) households
- 220 units acquired to be conveyed to qualified third parties to construct affordable housing

Details are provided in Section G of this Application.

B. Definitions and Descriptions

Abandoned Housing – A residential structure is abandoned when mortgage or tax foreclosure proceedings have been initiated for that property, no mortgage or tax payments have been made by the property owner for at least 90 days **AND** the property has been vacant for at least 90 days.

Affordable Rents – The extent to which gross housing costs (rents and utilities) do not exceed thirty percent (30%) of the household’s gross monthly income. HCDD uses the current HOME rent schedule to ensure that rents are affordable. Rent schedules include the cost of utilities in the rent amount.

Income Limits	Efficiency Unit	1-bedroom	2-bedroom	3-bedroom	4-bedroom	5-bedroom
<50% AMI	\$535	\$573	\$687	\$794	\$886	\$978
<80%AMI	\$631	\$705	\$852	\$999	\$1094	\$1189
<120%AMI	\$631	\$702	\$852	\$1042	\$1297	\$1642

Affordability Period – The amount of time that a property assisted with NSP funds must remain affordable to individuals or families who are income-qualified for NSP programs. The Housing and Economic Recovery Act (HERA) requires a period not less than the minimum affordability in the HOME regulations at 24 CFR 92.252(a), (c), (e), and (f) and 92.254. Housing and Community Development will ensure and enforce the affordability periods through Land Use Restrictions and legally binding agreements that will be monitored via existing monitoring protocols.

Current HCDD affordability standards are based upon the dollar amount of benefit to households. In the case of multiple sources of assistance to a project (for example, both NSP and HOME) a subsidy layering analysis will be conducted by beneficiary and the appropriate affordability period will be structured as follows:

Total Benefit less than \$15,000	5 year affordability
Total benefit \$15,000-40,000	10 year affordability
Total benefit greater than \$40,000	15 year affordability

Amendment to the Consolidated Plan – A change in the budget, scope, location or beneficiaries of a community development-funded project that requires revision of the Plan.

Blighted Structure – A residential or commercial building that exhibits an extensive level of physical decline or decay such that it constitutes a hazard to safety, health, or public welfare, or is a fire hazard.

Consolidated Action Plan – Annual submission to HUD that combines the Comprehensive Housing Affordability Strategy (CHAS) and a community development plan which encompasses the use of five (5) federal grants: CDBG, ESG, HOME, ADDI and HOPWA.

Foreclosed – A property “has been foreclosed upon” at the point that, under state or local law, the mortgage or tax foreclosure is complete. HUD generally will not consider a foreclosure to be complete until after the title of 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.

Housing Rehabilitation Standards – The general inspection standards currently utilized by Housing and Community Development are the Housing

Quality Standards (HQS) promulgated by HUD. HQS will be used to assess properties assisted with Neighborhood Stabilization Program (NSP) funds. Additionally, the City of Houston has adopted a set of minimum building standards in Chapter 10, Section 9, of the Code of Ordinances. These standards are included by reference into this definition.

LMMA – Designation for low–moderate–middle income area

LMMC – Designation for low-moderate-middle- income limited clientele

LMMH – Designation for low-moderate–middle-income households.

LMMJ – Designation for low-moderate-middle income jobs

Middle Income – Category of individuals and households whose incomes exceed (80%) but are below (120%) of area median income. This category is eligible for assistance under the NSP grant.

Neighborhood Stabilization Program – Established to assist in the redevelopment of abandoned and foreclosed homes under the Housing and Economic Recovery Act of 2008.

C. LOW INCOME TARGETING

The NSP requires that 25% of funds must be used to purchase and redevelop abandoned or foreclosed properties for housing individuals and families whose incomes do not exceed 50% of AMI. As indicated in Section B, above, a total of \$3,385,549 will be allocated to assist these households.

D. ACQUISITIONS AND RELOCATION

HCDD plans to acquire, or to assist non-profit groups to acquire, properties in the Target Zones. Project activities will focus on acquiring abandoned or vacant properties and therefore minimizing the need for relocation. It is anticipated that any funds needed to relocate families under the URA will be funded under the NSP as a cost of program activity.

The acquisition of multi-family properties will be limited to those that are vacant. It is anticipated that any multi-family properties acquired will be so blighted as to

require demolition. HCDD plans to redevelop these multi-family properties for ultimate use as single family for-sale housing.

E. PUBLIC COMMENT

HCDD used several mediums in publicizing the NSP and application. On 10/24/2008, HCDD announced the intent to substantially amend the 2008 Consolidated Action Plan in Houston's daily and community newspapers. A summary of the Amendment was published in the Houston Chronicle newspaper on 11/3/08 and residents were encouraged to submit comments during the fifteen day review period. In addition, the NSP summary was placed on HCDD's website. Draft copies of the NSP Amendment/Application were distributed at the November 12th public hearing on the 2009 Consolidated Action Plan. Copies were also available at HCDD offices at 601 Sawyer.

HCDD did not receive any comments/questions about NSP at the public hearing. However, following the hearing, comments/questions were received from Boat People SOS (BPSOS) and from the Local Support Initiative Corporation (LISC). BPSOS wanted to have an opportunity to assist the Vietnamese community with information about the Neighborhood Stabilization Program, particularly translating the information and outlining the process for accessing services. BPSOS's comments were related to the Housing Department's goal of contracting with appropriate non-profits for delivery of services through NSP. As detailed in the plan/application, the services of such non-profits would be secured through issuance of a Request for Proposals. Housing and Community Development Department stressed that the process would be open and competitive.

LISC submitted the agency's comments in a letter dated November 18th. The letter and HCDD response follow in Appendix A.

In accordance with the NSP requirements, the City of Houston provided the citizens of Houston several opportunities to participate in the public review process of the proposed 2008 Consolidated Action Plan amendment. A summary of the NSP was republished in three local newspapers, each with city-wide circulation, and residents were encouraged to submit comments during the 15 day review period which extended from January 16, 2009 through January 31, 2009. In addition, a final draft, with related maps, was reposted on the Department's website for review by the public. Lastly, the newspaper publications indicated that copies of the proposed NSP amendment were made available, free of charge. A copy of the posting is attached in Appendix B.

HCDD did not receive any comments or questions during the public review period dated January 16, 2009 through January 31, 2009.

F. NSP PROGRAM BY ACTIVITY

Activity Name	Foreclosed Housing Acquisition, Repair and Resale
NSP Eligible Use	B, D, and E
Project Budget	\$3,385,549
Location	Target Zones 1,2,3
Objective	Housing
National Objective	LMMH
Consolidated Plan Objective	Expanding the stock of safe, sanitary, affordable housing
Citation	24CFR Part 570
Affordability Period	5,10, or 15 years depending on subsidy analysis
Performance Measures	40 properties acquired; 40 units produced; all at or below 50% of AMI
Start Date	Upon HUD approval
End Date	18 months from approval for acquisition; 36 months for repair and resale

Activity Description:

HCDD will acquire foreclosed properties at a maximum of 85% of appraised value with an overall NSP portfolio average no greater than 85% of appraised value. Properties will be secured/demolished as needed for safety and blight removal. HCDD will, through an RFQ/RFP process, either repair and resell these properties to qualified low-income buyers, or convey these properties to qualified non-profit developers to perform all needed repairs to bring properties into Housing Rehabilitation Standards compliance.

These properties will be sold to income-qualified households earning less than 50% of AMI. Households earning less than 50% AMI will be affirmatively sought for participation in this program. Any profit from sale must be retained by a non-profit developer to engage in further low-moderate income housing programs, or returned to HCDD, in accordance with established resale/recapture provisions.

Homebuyers will be required to take an 8 hour training course to qualify for purchasing one of these homes.

Use of sub-prime loans will be disallowed. In lieu of such loans, additional subsidies will be considered to assure buyers are committed to mortgages they can sustain. Home buyers may qualify for down payment assistance under HCDD's existing HAP program. Affordability periods will reflect total subsidy in place per homeowner to be determined through a subsidy layering analysis. Long term affordability will be ensured via the affordability covenants and/or second mortgage normally placed by HCDD on homes serviced via the HAP down payment assistance program.

This program will be available to all households earning less than 50% of AMI within the City of Houston.

It is anticipated that properties will be acquired and repaired at an average cost of \$85,000 per property. A total of 40 beneficiary households are anticipated. Of these, the program will exclusively serve families below 50%.

G. NSP PROGRAM BY ACTIVITY (continued)

Activity Name	Acquisition/Blight Removal/Redevelopment
NSP Eligible Use	B, D, and E
Project Budget	\$8,802,425
Location	Target Zones 1,2,3
Objective	Housing
National Objective	LMMH
Consolidated Plan Objective	Expanding the stock of safe, sanitary, affordable housing
Citation	24CFR Part 570
Affordability Period	5 , 10, or 15 years depending on subsidy analysis
Performance Measures	220 units acquired to be conveyed to qualified third parties to construct affordable housing
Start Date	Upon HUD approval
End Date	18 months from approval for acquisition with complete liquidation of all land no greater than 120 months from HUD approval

Activity Description:

HCDD will acquire foreclosed properties at a maximum of 85% of appraised value with an overall NSP portfolio average no greater than 85% of appraised value. Properties will be secured/demolished as needed for safety and blight removal.

These properties will be conveyed to qualified third parties to construct new for-sale housing units affordable to LMMH.

Use of sub-prime loans will be disallowed. In lieu of such loans, additional subsidies will be considered to assure buyers are committed to mortgages they can sustain. Home buyers may qualify for down payment assistance under HCDD's existing HAP program. Affordability periods will reflect total subsidy in place per homeowner to be determined through a subsidy layering analysis. Long term affordability will be ensured via the affordability covenants and/or

second mortgage normally placed by HCDD on homes serviced via the HAP down payment assistance program.

This program will be available to all households earning less than 120% of AMI within the City of Houston. Homebuyers will be required to take an 8 hour training course to qualify for purchasing one of these homes.

HCDD anticipates acquiring properties at an average of \$20,000 per property and investing no more than an additional \$20,000 per unit on average into the properties (\$40,000 per unit total) for such items as securing property, environmental studies, surveys, and similar. Properties will be conveyed quickly to third parties to develop. HCDD's intent is not to land bank but to place these unused properties into the housing pool as rapidly as possible.

HCDD anticipates acquiring properties with a total of 220 units. HCDD also anticipates creating 220 units of housing. All units will be available to households earning less than 120% of AMI.

G. NSP PROGRAM BY ACTIVITY (continued)

Activity Name	Program Administration
NSP Eligible Use	N/A
Project Budget	\$1,354,219
Location	N/A
Objective	Housing
National Objective	LMMH
Consolidated Plan Objective	Expanding the stock of safe, sanitary, affordable housing
Citation	24CFR Part 570
Compliance Period	N/A
Performance Measures	Staff costs of administering NSP grant funds.
Start Date	Upon HUD approval
End Date	18 months from approval for acquisition; 36 months for repair and resale

Activity Description:

Ten percent of the award amount is allowed for program administration. This activity will allow for the planning, performance, and monitoring of activities undertaken under the NSP.

NSP Substantial Amendment Checklist

For the purposes of expediting review, HUD asks that applicants submit the following checklist along with the NSP Substantial Amendment and SF-424.

Contents of an NSP Action Plan Substantial Amendment

Jurisdiction(s): City of Houston Jurisdiction Web Address: www.houstontx.gov/housing	NSP Contact Person: Donald Sampley Address: 601 Sawyer, Houston, TX 77007 Telephone: 713-868-8300 Email: Donald.Sampley@cityofhouston.net
--	--

The elements in the substantial amendment required for the Neighborhood Stabilization Program are:

A. AREAS OF GREATEST NEED

Does the submission include summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction?

Yes No Verification found on **pages 1 and 2.**

B. DISTRIBUTION AND USES OF FUNDS

Does the submission contain 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?

Yes No Verification found on **pages 2 and 3.**

Note: The grantee's narrative must address the three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

C. DEFINITIONS AND DESCRIPTIONS

For the purposes of the NSP, do the narratives include:

- a definition of "blighted structure" in the context of state or local law,
Yes No Verification found on **page 4.**
- a definition of "affordable rents,"
Yes No Verification found on **page 3.**
- a description of how the grantee will ensure continued affordability for NSP assisted housing,
Yes No Verification found on **page 4.**

- a description of housing rehabilitation standards that will apply to NSP assisted activities?
Yes No . Verification found on **pages 4 and 5.**

D. LOW INCOME TARGETING

- Has the grantee described how it will meet the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
Yes No . Verification found on **pages 3 and 5.**
- Has the grantee identified how the estimated amount of funds appropriated or otherwise made available will 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% of area median income?
Yes No . Verification found on **pages 5 and 7.**
Amount budgeted = **\$3,385,549**

E. ACQUISITIONS & RELOCATION

Does grantee plan to demolish or convert any low- and moderate-income dwelling units?
Yes No . (If no, continue to next heading)
Verification found on **pages 5 and 6.**

If so, does the substantial amendment 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?
Yes No . Verification found on page ____.
- 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)?
Yes No . Verification found on **page 10.**
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income?
Yes No . Verification found on **page 8.**

F. PUBLIC COMMENT PERIOD

Was the proposed action plan amendment published via the grantee jurisdiction's usual methods and on the Internet for no less than 15 calendar days of public comment?
Yes No . Verification found on **page 6.**

Is there a summary of citizen comments included in the final amendment?
Yes No Verification found on **page 6**.

G. INFORMATION BY ACTIVITY

Does the submission contain information by activity describing how the grantee will use the funds, identifying:

- eligible use of funds under NSP,
Yes No Verification found on **pages 7-11**.
- correlated eligible activity under CDBG,
Yes No Verification found on **page 7**.
- the areas of greatest need addressed by the activity or activities,
Yes No Verification found on **page 7**.
- expected benefit to income-qualified persons or households or areas,
Yes No Verification found on **pages 7 and 9**.
- does the applicant indicate which activities will count toward the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
Yes No Verification found on **page 7**.
- appropriate performance measures for the activity,
Yes No Verification found on **pages 7 and 9**.
- amount of funds budgeted for the activity,
Yes No Verification found on **pages 7 and 9**.
- the name, location and contact information for the entity that will carry out the activity,
Yes No Verification found on page ____.
- expected start and end dates of the activity?
Yes No Verification found on **pages 7 and 9**.
- If the activity includes acquisition of real property, the discount required for acquisition of foreclosed upon properties,
Yes No Verification found on **page 7**.
- If the activity provides financing, the range of interest rates (if any),
Yes No Verification found on page ____.

- If the activity provides housing, duration or term of assistance,
Yes No . Verification found on **page 9**.
- tenure of beneficiaries (e.g., rental or homeownership),
Yes No . Verification found on **page 7**.
- does it ensure continued affordability?
Yes No . Verification found on **page 4**.

H. CERTIFICATIONS

The following certifications are complete and accurate:

- | | | |
|--|---|-----------------------------|
| (1) Affirmatively furthering fair housing | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-lobbying | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Authority of Jurisdiction | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) Consistency with Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (5) Acquisition and relocation | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (6) Section 3 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (7) Citizen Participation | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (8) Following Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (9) Use of funds in 18 months | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (10) Use NSP funds \leq 120 of AMI | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (11) No recovery of capital costs thru special assessments | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (12) Excessive Force | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (13) Compliance with anti-discrimination laws | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (14) Compliance with lead-based paint procedures | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (15) Compliance with laws | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Certifications

**Original Documents and Signatures were
Submitted to HUD on November 25, 2008**

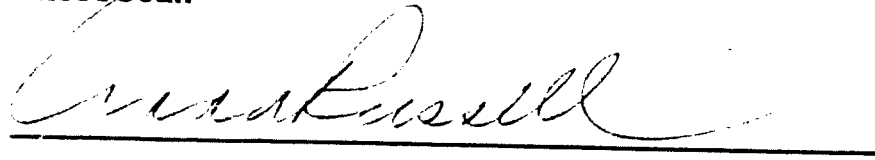
**APPLICATION FOR
FEDERAL ASSISTANCE**

OMB Approved No. 3076-0006

Version 7/03

1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction		2. DATE SUBMITTED Applicant Identifier
<input type="checkbox"/> Pre-application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction	3. DATE RECEIVED BY STATE State Application Identifier	
5. APPLICANT INFORMATION Legal Name: City of Houston City of Houston Organizational DUNS: 832431985 Address: Street: 601 Sawyer P. O. Box 1562 City: Houston County: Harris State: Texas Zip Code 77251 Country: U.S.A.		4. DATE RECEIVED BY FEDERAL AGENCY Federal Identifier Organizational Unit Department: Housing and Community Development Division: Name and telephone number of person to be contacted on matters involving this application (give area code) Prefix: First Name: Richard Middle Name S. Last Name Cell Suffix: Email: richard.celli@cityofhouston.net
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 74-6001164		Phone Number (give area code) 713.868.8305 Fax Number (give area code) 713.865.4135
8. TYPE OF APPLICATION: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) Other (specify)		7. TYPE OF APPLICANT: (See back of form for Application Types) Municipal Other (specify)
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: TITLE (Name of Program): Neighborhood Stabilization Program 14-218		9. NAME OF FEDERAL AGENCY: Federal Mediation and Conciliation Service 11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Revitalize/Redevelop foreclosed/abandoned residential properties
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): City of Houston		14. CONGRESSIONAL DISTRICTS OF: a. Applicant 7, 8, 9, 18, 22, 25, 29 b. Project 7, 8, 9, 18, 22, 25, 29
13. PROPOSED PROJECT Start Date: 01/01/09 Ending Date: 06/30/10		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE: b. No. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW
15. ESTIMATED FUNDING: a. Federal \$ 13,542,193.00 b. Applicant \$.00 c. State \$.00 d. Local \$.00 e. Other \$.00 f. Program Income \$.00 g. TOTAL \$ 13,542,193.00		17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? <input type="checkbox"/> Yes If "Yes" attach an explanation. <input checked="" type="checkbox"/> No
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.		
a. Authorized Representative Prefix First Name Bill White Middle Name Last Name White Title Mayor Signature of Authorized Representative		Suffix c. Telephone Number (give area code) 832.393.1011 e. Date Signed

Attest/Seal:



City Secretary

Countersigned:



City Controller 

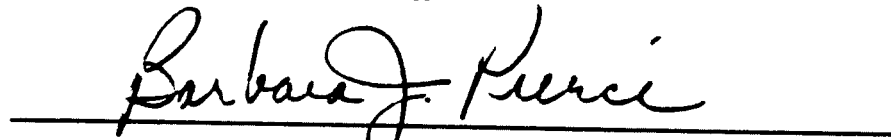
DATE OF COUNTERSIGNATURE: 11-20, 2008

APPROVED:



**Director
Housing and Community Development Department**

APPROVED AS TO FORM:



Assistant City Attorney

- (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 ≤ 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.

Bill White

Signature/Authorized Official

Angela White

11/20/08

Date

11/20/08

Mayor

Title

Appendix A



November 18, 2008

Mr. Richard Celli
Director
Housing & Community Development Department
City of Houston
P.O. Box 1562
Houston, Texas 77251

Delivered Electronically

Dear Mr. Celli:

Houston LISC appreciates the opportunity to contribute the following recommendations for consideration regarding the City's Neighborhood Stabilization Program Draft Plan, currently open for public comment.

One of our most pressing concerns is that the NSP Plan would include only the minimum Affordability Period required by HUD, i.e., 5 years. The legislation creating this one-time funding opportunity, HERA, clearly anticipated "continued affordability" and encourages Grantees to "ensure, to the maximum extent practicable and for the longest feasible term, that the sale, rental or redevelopment of abandoned and foreclosed-upon homes and residential properties under this section remain affordable...".

We encourage you to consider various ways to increase the affordability period for the properties purchased with NSP funds. For the past fifteen years, HUD has recognized the value of Community Land Trusts, as evidenced by the Notice issued on December 20, 1993, CPD-93-42, stating that

"Community Land Trusts are, perhaps, one of the most effective means of ensuring permanent affordability of resident ownership simply because the trust maintains ownership of the land. The objective of a CLT is to acquire land and make it available to individual families, cooperatives and others through long term leases up to 99 years. While the leaseholders do not hold title to the land, they may own the buildings or housing units/structures on the land."

We encourage the City of Houston to specifically include Community Land Trusts in the Program design, and to work with local non-profits to create one or more Community Land Trusts in Houston. LISC is available as a resource for this effort. The City of Austin has created a successful model that is consistent with Texas law and market conditions.

Secondly, acknowledging that we are experiencing an historic tightening of credit, particularly home mortgage lending for buyers with incomes below 50% of AMI, we recommend that Acquisition/Rehabilitation activity include and encourage non-profit ownership of rental properties for individuals and families below 50% AMI, as an alternative to homeownership. This will also ensure the timely use of the NSP funding, regardless of market conditions.

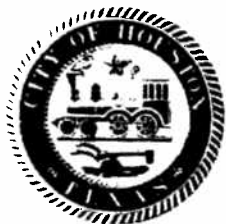
The Local Initiatives Support Corporation (LISC) is a national nonprofit community development support organization with a local presence. LISC is dedicated to helping community organizations transform distressed neighborhoods into healthy and sustainable communities of choice and opportunity — good places to work, do business and raise children.

Thank you for your efforts to create a plan to assist Houston neighborhoods during this challenging time. We appreciate your consideration of our comments. We look forward to working with you in the implementation of the Neighborhood Stabilization Program.

Sincerely,

A handwritten signature in black ink, appearing to read "Amanda Timm", with a long horizontal flourish extending to the right.

Amanda Timm
Executive Director



CITY OF HOUSTON
Housing & Community Development Department

Bill White

Mayor

Richard S. Celli
Director
801 Sawyer Street
Houston, Texas 77007

T. (713) 868-8300
F. (713) 868-8414
www.houstonhousing.org

December 22, 2008

Amanda Timm
Executive Director
Local Initiatives Support Corporation
2640 Fountainview Drive, Suite 220
Houston, Texas 77057

Dear Ms. Timm:

Thank you for your letter regarding the Neighborhood Stabilization Program (NSP) for the City of Houston. The Housing and Community Development Department (HCDD) is diligently working to implement plans that will assist Houston neighborhoods with the greatest needs. The NSP funds will allow HCDD to address foreclosure issues and remain committed to providing affordable housing for low to moderate income residents.

I appreciate your comments and look forward to working with you in the future.

Regards,

Richard Celli

Appendix B

PUBLIC NOTICE

The City of Houston Housing and Community Development Department (HCDD) has initiated work on the **2009 Consolidated Action Plan**. HCDD has scheduled the first of two (2) public hearings on the Plan for Wednesday, November 12, 2008 at 7:00 p.m. in the former Council Chambers at City Hall Annex (900 Bagby, Public Level). The purpose of this hearing is to solicit the public's involvement in the planning process. During the public hearing, HCDD will also discuss its proposal to substantially amend the current **2008 Consolidated Action Plan** to include the new **Neighborhood Stabilization Program (NSP)**. The NSP was created by the U.S. Department of Housing and Urban Development to reduce the adverse impact of abandoned and foreclosed properties in areas of greatest need. A summary of the NSP Amendment will be published prior to the November 12th public hearing.

Contact HCDD if special arrangements are needed. For more information on the Public Hearing, contact Paulette Wagner at paulette.wagner@cityofhouston.net or 713-868-8441 or Christine Cuddeback at christine.cuddeback@cityofhouston.net or 713-868-8448.

This Notice also revises the proposed amount published on April 25, 2008 for Houston Leased Housing Associates I, LP. The City, through HCDD, is proposing to award HOME funds in the amount of \$1,100,000.00 to finance the rehabilitation of 150 affordable rental housing units in District D for low to moderate income citizens.

The public has thirty (30) days to comment on this proposed revision of funding. The thirty day period extends from Friday, October 24, 2008 through Monday, November 24, 2008. Following the public comment period, projects awarded amounts in excess of \$50,000.00 must be presented to City Council for approval. The contact number for HCDD is 713-868-8300.

SUMMARY NEIGHBORHOOD STABILIZATION PROGRAM (NSP)

NSP was established, by the federal government, to help finance redevelopment of abandoned and foreclosed homes in economically distressed areas of the city. Through NSP, the City of Houston is scheduled to receive \$13,542,193 to finance improvement strategies in areas adversely impacted by residential foreclosures. Houston's NSP identifies areas of greatest need, households to be targeted, proposed distribution of federal funds and strategies to combat the impact of foreclosures. Based on the number of residential foreclosures, housing characteristics and census data, sections of Houston were rated as to possible risk for increased foreclosures and abandonments. HCDD will concentrate NSP dollars in the highest risk areas in order to first contain and then reduce foreclosure and abandonment problems in communities bearing the brunt of this problem. The goal is to leverage NSP funds with private sector and local dollars to reduce foreclosures, increase homeownership, and expand the stock of affordable housing while removing the presence of vacant and abandoned buildings. These improvement strategies will then be replicated in adjacent communities around each of the high risk areas. HCDD is proposing to distribute NSP funds among the following program categories:

Acquisition/Blight Removal	\$8,802,425
Acquisition/Rehabilitation	3,385,549
Administration	1,354,219

TOTAL	\$13,542,193
--------------	---------------------

Application for the Neighborhood Stabilization Program represents a "substantial" amendment to the **2008 Consolidated Action Plan**. A draft copy of the **Neighborhood Stabilization Program** will be available, free of charge, from the Housing and Community Development Department on Friday, November 7, 2008. The Plan will also be placed on HCDD's website at www.houstonhousing.org and will be available at the November 12th public hearing on the **2009 Consolidated Action Plan**. The public is invited to comment on the NSP during the 15-day review period which extends from Tuesday, November 4th through Tuesday, November 18th. The NSP will be submitted to City Council for approval. For more information, contact Paulette Wagner (713-868-8441) or Christine Cuddeback (713-868-8448).

**SUMMARY
NEIGHBORHOOD STABILIZATION PROGRAM (NSP)**

NSP was established, by the federal government, to help finance redevelopment of abandoned and foreclosed homes in economically distressed areas of the city. Through NSP, the City of Houston is scheduled to receive \$13,542,193 to finance improvement strategies in areas adversely impacted by residential foreclosures. Houston's NSP identifies areas of greatest need, households to be targeted, proposed distribution of federal funds and strategies to combat the impact of foreclosures. Based on the number of residential foreclosures, housing characteristics and census data, sections of Houston were rated as to possible risk for increased foreclosures and abandonments. Houston and Community Development Department (HCDD) will concentrate NSP dollars in the highest risk areas in order to first contain and then reduce foreclosure and abandonment problems in communities bearing the brunt of this problem. The goal is to leverage NSP funds with private sector and local dollars to reduce foreclosures, increase homeownership, and expand the stock of affordable housing while removing the presence of vacant and abandoned buildings. These improvement strategies will then be replicated in adjacent communities around each of the high risk areas. HCDD is proposing to distribute NSP funds among the following program categories:

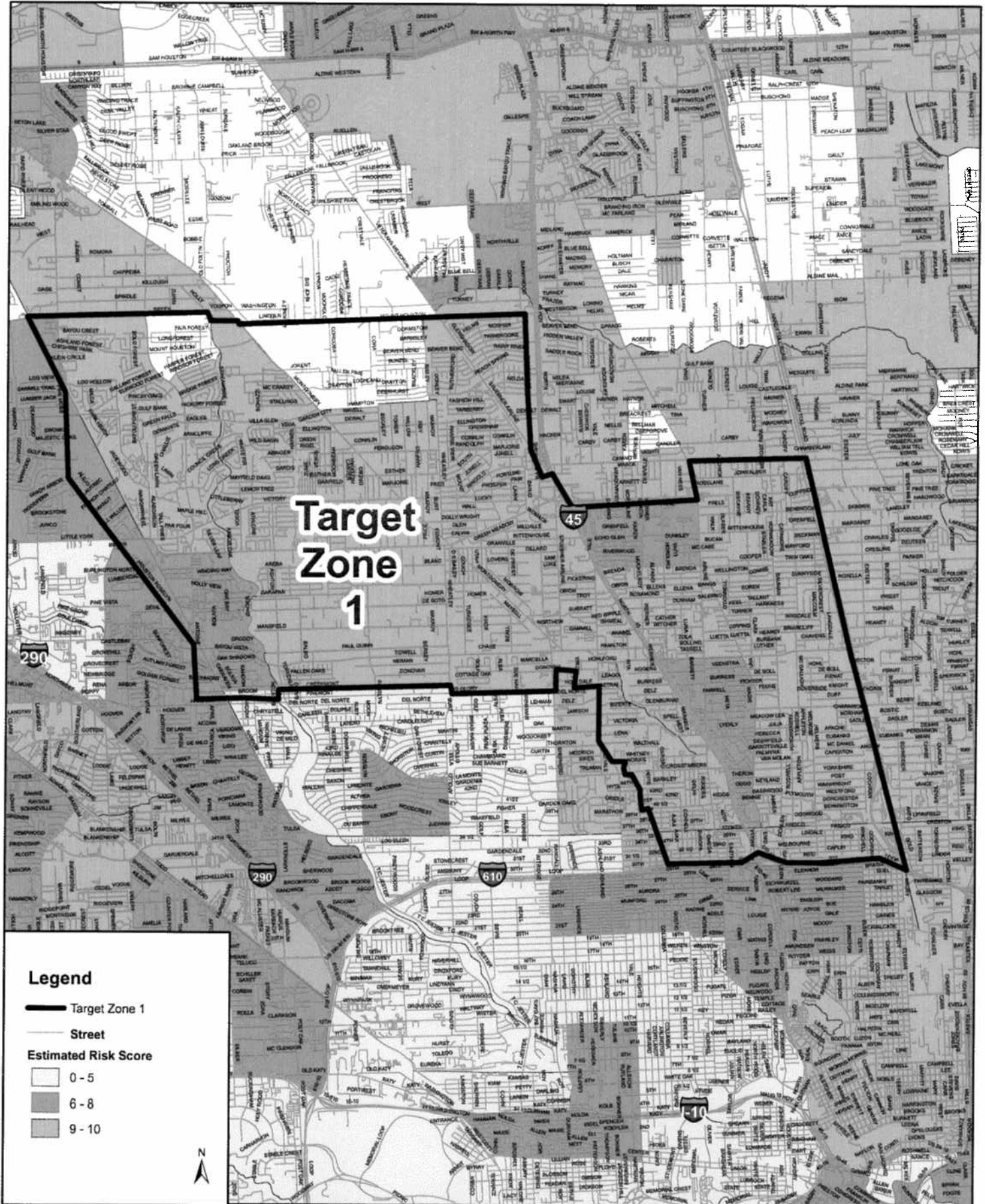
Acquisition/Blight Removal	\$8,802,425
Acquisition/Rehabilitation	3,385,549
Administration	1,354,219

TOTAL \$13,542,193

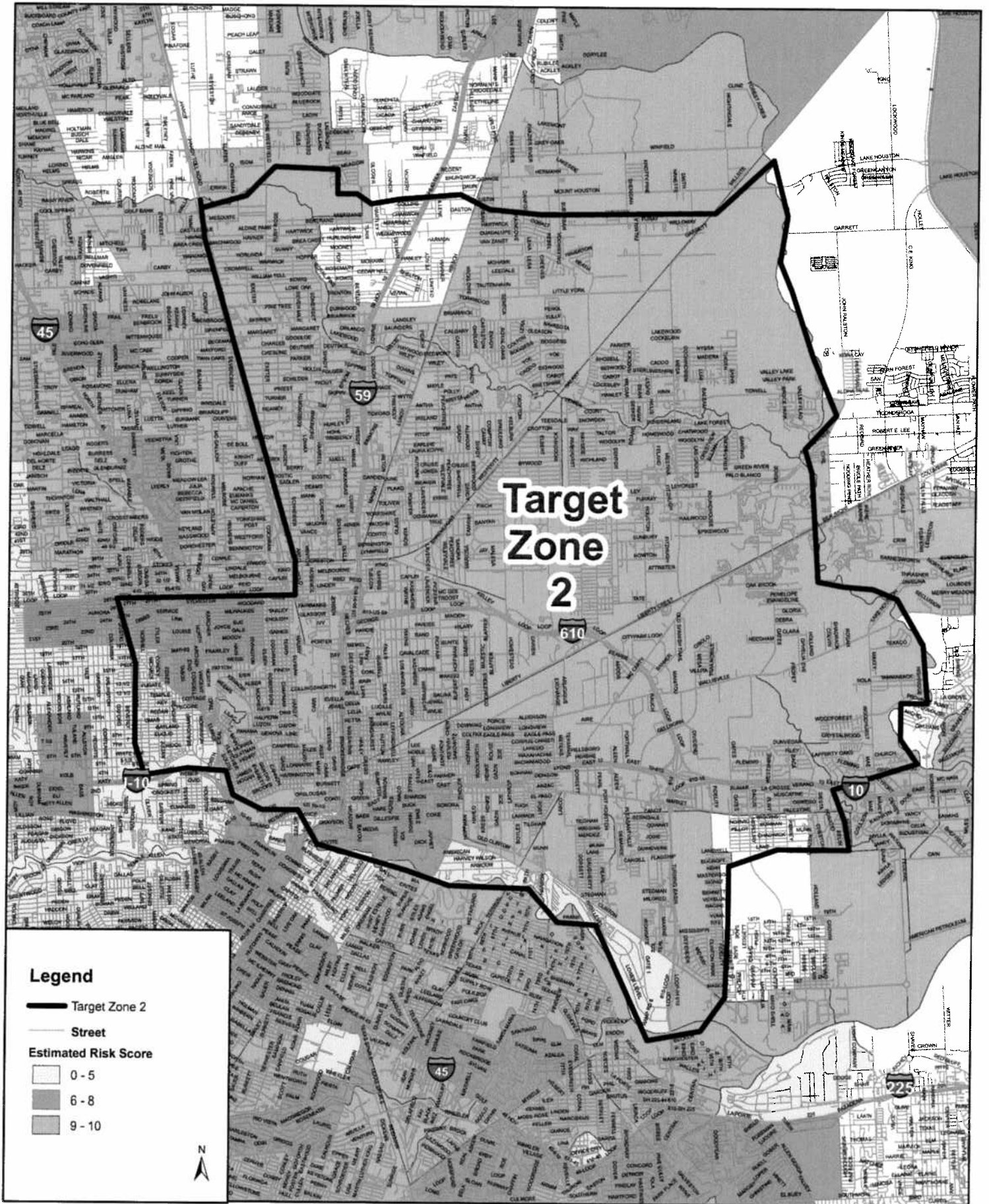
Application for the Neighborhood Stabilization Program represents a "substantial" amendment to the **2008 Consolidated Action Plan**. A draft copy of the **Neighborhood Stabilization Program** will be available, free of charge, from the Housing and Community Development Department on Friday, January 16, 2009. The Plan is also available on HCDD's website at www.houstonhousing.org. The public is invited to comment on the NSP during the 15-day review period which extends from Friday, January 16, 2009 through Saturday, January 31, 2009. For more information, contact Marnie Thomas 713-868-8300.

Appendix C

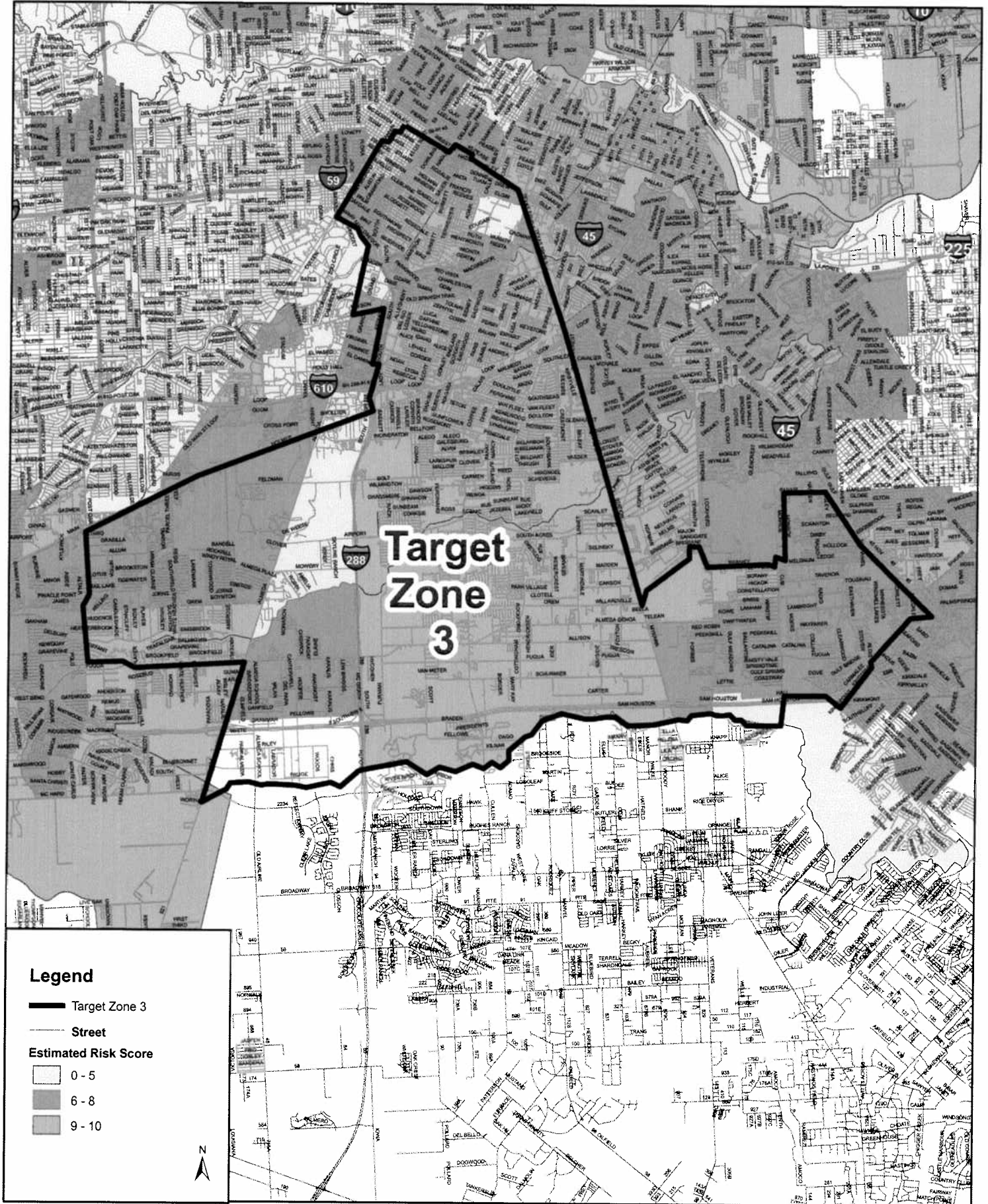
NSP Target Zone 1 Foreclosure/Abandonment At-Risk Areas



NSP Target Zone 2 Foreclosure/Abandonment At-Risk Areas

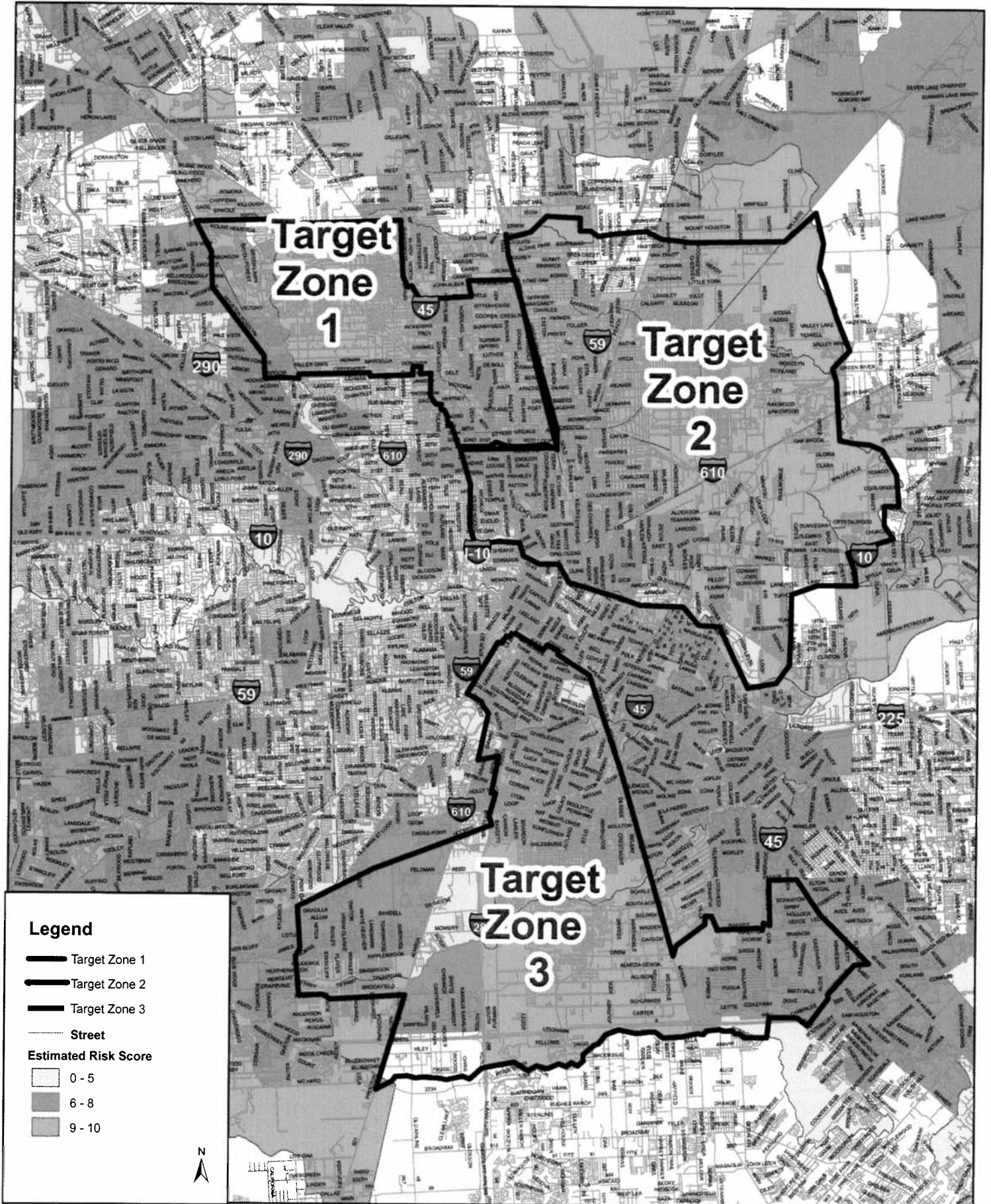


NSP Target Zone 3 Foreclosure/Abandonment At-Risk Areas

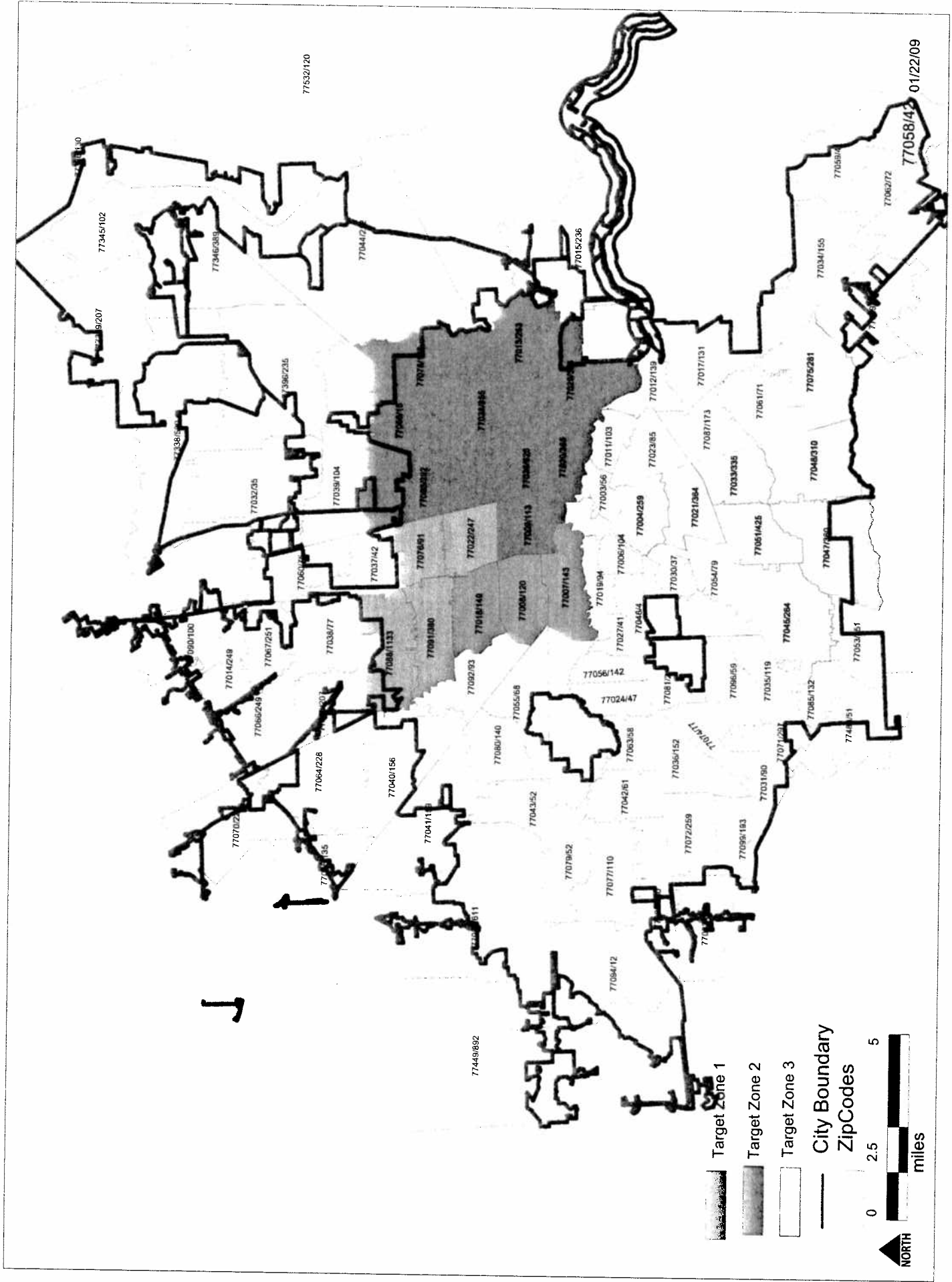


NSP Target Zones

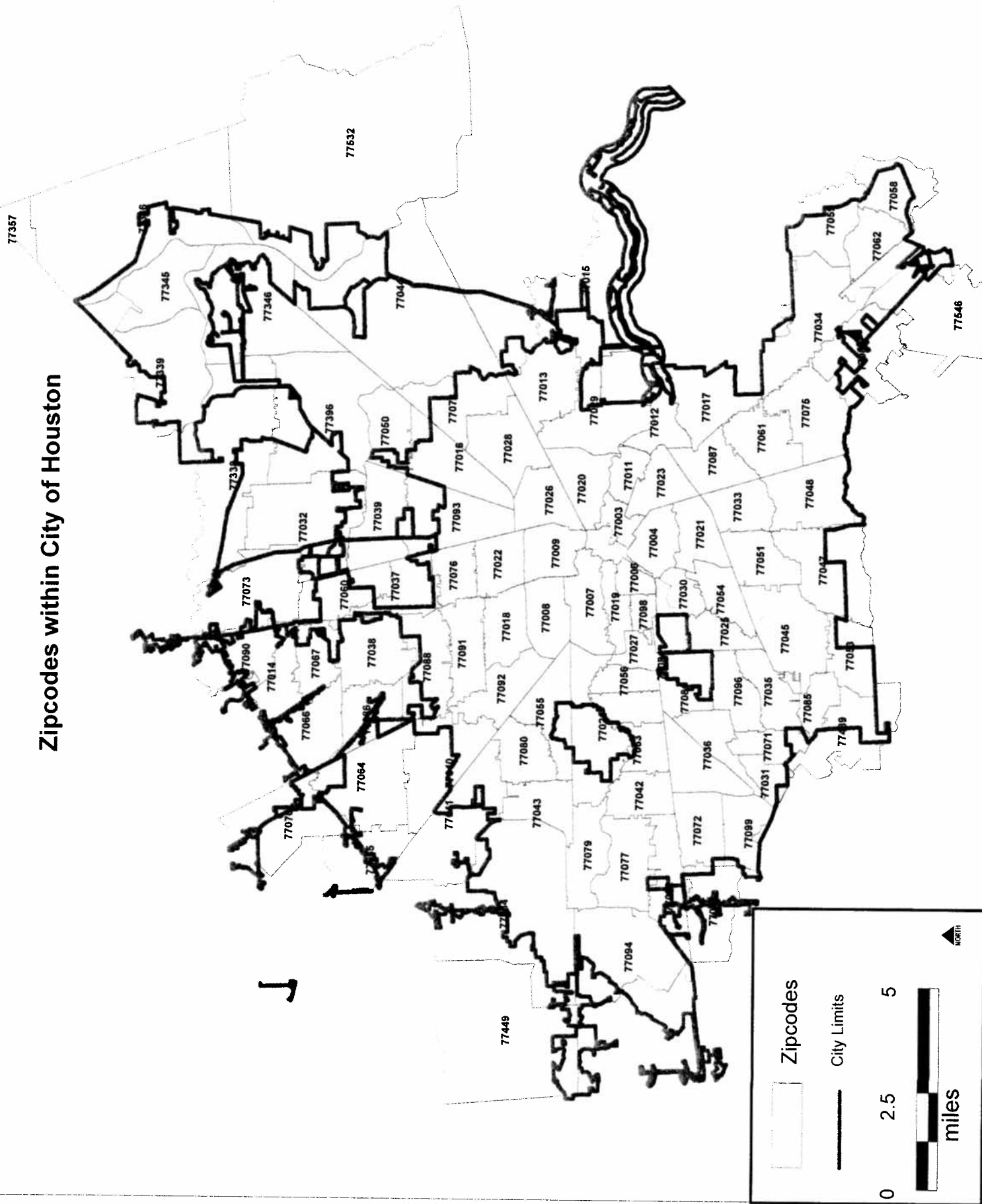
Foreclosure/Abandonment At-Risk Areas



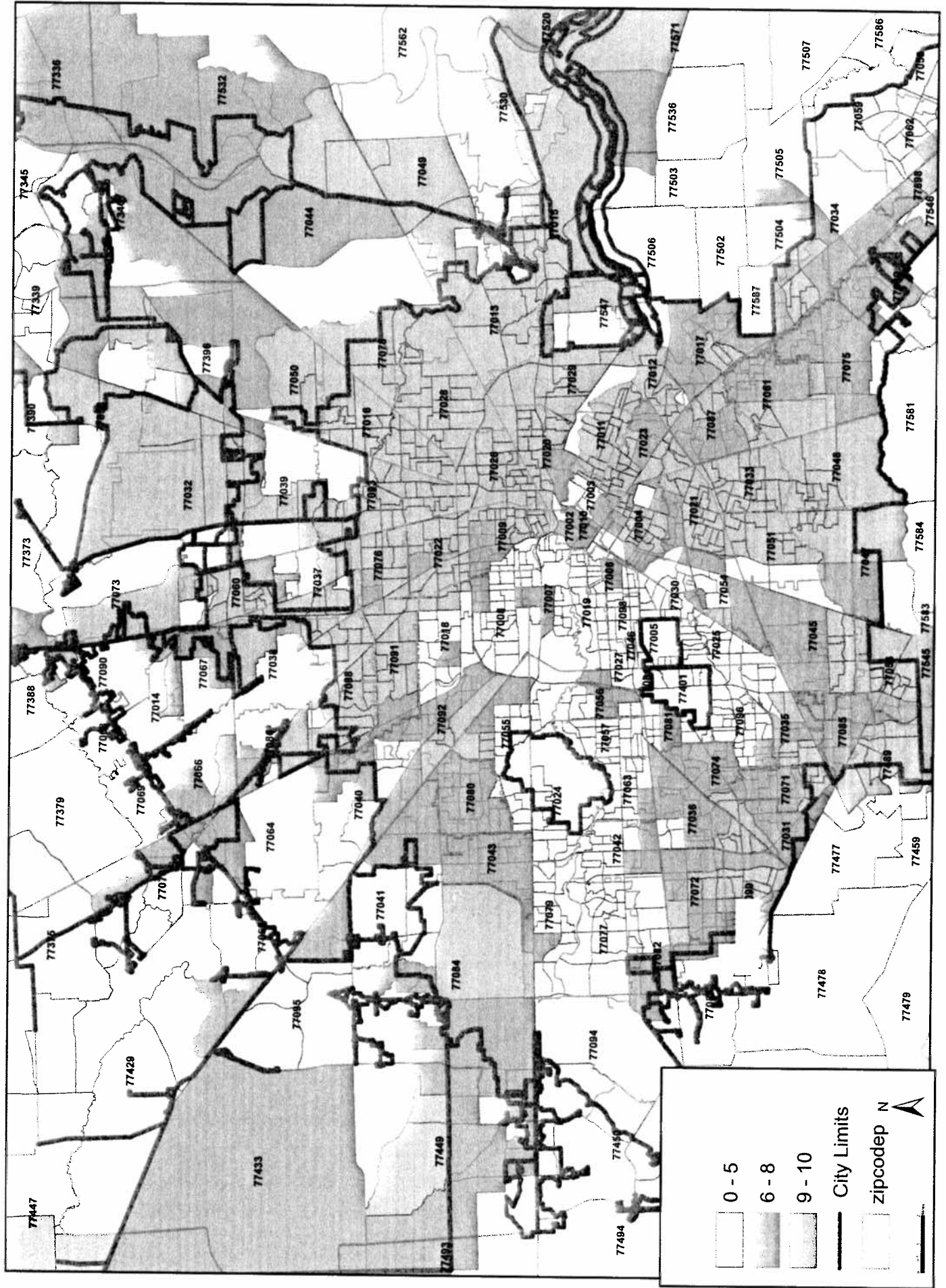
Foreclosure/Abandonment At-Risk Areas



Zipcodes within City of Houston



Risk Score Rating
(Source: HUD Data)



HCDD DATA

SOURCES: US Loan Data and COH Tax Foreclosure Data

ZipCode	County	State	Loans		Sub Prime		Foreclosure		Foreclosure +		Tax Foreclosure	COH	Lending	
			March 08	March 08	Loans	March 08	March 08	REO	REO	REO + Tax			Foreclosure	Zone
77088	Harris	Texas	6853	2051	270	103	373	760	1133	1				
77449	Harris	Texas	23141	4981	601	291	892		892				892	
77028	Harris	Texas	756	365	51	20	71	784	855	2			855	
77026	Harris	Texas	678	321	49	19	68	557	625	2			625	
77084	Harris	Texas	19968	3183	441	168	609	2	611				611	
77338	Harris	Texas	6525	1587	202	90	292	228	520				520	
77016	Harris	Texas	1511	738	82	21	103	382	485	2			485	
77051	Harris	Texas	696	341	66	25	91	334	425	3			425	
77346	Harris	Texas	15943	1917	268	115	383	6	389				389	
77091	Harris	Texas	1386	404	59	17	76	304	380	1			380	
77020	Harris	Texas	1146	345	42	10	52	313	365	2			365	
77021	Harris	Texas	1816	572	68	44	112	252	364	3			364	
77047	Harris	Texas	3639	1220	147	67	214	146	360	3			360	
77095	Harris	Texas	18017	1879	246	102	348	11	359				359	
77083	Harris	Texas	8514	1814	239	100	339	1	340				340	
77033	Harris	Texas	1595	767	87	35	122	213	335	3			335	
77029	Harris	Texas	1147	359	40	12	52	273	325	2			325	
77048	Harris	Texas	1646	690	68	27	95	215	310	3			310	
77071	Harris	Texas	4339	937	135	58	193	104	297				297	
77093	Harris	Texas	1896	612	53	16	69	223	292	2			292	
77075	Harris	Texas	5226	1341	146	61	207	74	281	3			281	
77045	Harris	Texas	3674	1224	113	48	161	103	264	3			264	
77004	Harris	Texas	2922	451	72	65	137	122	259	3			259	
77072	Harris	Texas	7627	1571	158	76	234	25	259				259	
77089	Harris	Texas	9118	1627	212	32	244	13	257				257	
77013	Harris	Texas	1098	312	26	5	31	222	253	2			253	
77067	Harris	Texas	3928	1208	176	74	250	1	251				251	
77014	Harris	Texas	4557	1152	158	91	249	0	249				249	
77066	Harris	Texas	6242	1318	181	68	249		249				249	
77022	Harris	Texas	1470	511	28	9	37	210	247	1			247	
77015	Harris	Texas	5720	1392	149	65	214	22	236				236	
77396	Harris	Texas	6820	1381	155	68	223	12	235				235	
77082	Harris	Texas	7713	1200	142	71	213	17	230				230	
77064	Harris	Texas	9209	1314	171	56	227	1	228				228	
77070	Harris	Texas	9490	1040	159	67	226		226				226	

HCDD DATA

SOURCES: US Loan Data and COH Tax Foreclosure Data

ZipCode	County	State	Loans		Sub Prime		Foreclosure		REO	March 08	REO	March 08	REO	Tax Foreclosure	COH	Lending
			March 08	March 08	March 08	March 08	March 08	March 08								
77044	Harris	Texas	5447	1150	151	59	210	2								212
77086	Harris	Texas	4101	1069	157	49	206	1								207
77339	Harris	Texas	7096	652	98	24	122	85								207
77099	Harris	Texas	5144	1201	128	65	193	193								193
77087	Harris	Texas	2668	686	88	18	106	67								173
77078	Harris	Texas	1096	453	48	22	70	98								168
77041	Harris	Texas	7804	841	85	48	133	26								159
77040	Harris	Texas	7424	973	111	43	154	2								156
77034	Harris	Texas	3761	917	86	41	127	28								155
77036	Harris	Texas	3562	421	74	33	107	45								152
77049	Harris	Texas	4468	1089	116	35	151	1								152
77053	Harris	Texas	1725	632	70	31	101	50								151
77018	Harris	Texas	4782	377	44	8	52	97								149
77057	Harris	Texas	6158	350	45	19	64	83								147
77007	Harris	Texas	7172	386	56	52	108	35								143
77056	Harris	Texas	3761	249	35	64	99	43								142
77080	Harris	Texas	3622	578	68	14	82	58								140
77012	Harris	Texas	785	233	13	4	17	122								139
77536	Harris	Texas	6262	811	99	40	139	139								139
77065	Harris	Texas	6193	785	101	34	135	135								135
77085	Harris	Texas	2884	691	65	24	89	43								132
77017	Harris	Texas	2759	675	62	22	84	47								131
77336	Harris	Texas	2374	345	48	19	67	63								130
77008	Harris	Texas	6403	354	71	34	105	15								120
77502	Harris	Texas	3668	917	80	40	120	120								120
77532	Harris	Texas	4664	659	77	34	111	120								120
77035	Harris	Texas	4356	560	72	29	101	119								119
77009	Harris	Texas	4501	489	45	25	72	41								113
77077	Harris	Texas	8221	502	58	31	89	21								110
77006	Harris	Texas	4384	262	40	43	83	104								104
77039	Harris	Texas	2240	643	75	29	104	104								104
77011	Harris	Texas	607	182	12	8	20	83								103
77345	Harris	Texas	7457	282	53	14	67	102								102
77090	Harris	Texas	2652	551	66	34	100	100								100
77019	Harris	Texas	4677	195	34	54	88	94								94

HCDD DATA

SOURCES: US Loan Data and COH Tax Foreclosure Data

ZipCode	County	State	Loans		Sub Prime		Foreclosure	REO	March 08	REO	Foreclosure +		Tax Foreclosure	COH	Lending
			March 08	March 08	Loans	Loans					REO	REO			
77503	Harris	Texas	2734	607	69	25	94								94
77092	Harris	Texas	3309	500	50	14	64								93
77076	Harris	Texas	2097	567	51	12	63								91
77031	Harris	Texas	2007	374	45	20	65								90
77023	Harris	Texas	2026	417	43	9	52								85
77025	Harris	Texas	4193	175	13	5	18								81
77054	Harris	Texas	2584	168	26	16	42								79
77038	Harris	Texas	2800	760	52	25	77								77
77074	Harris	Texas	3279	567	43	22	65								77
77060	Harris	Texas	1903	536	52	23	75								75
77505	Harris	Texas	4660	536	56	19	75								75
77506	Harris	Texas	2114	569	52	21	73								73
77062	Harris	Texas	6282	417	53	15	68								72
77061	Harris	Texas	1755	421	37	16	53								71
77069	Harris	Texas	3607	238	52	19	71								71
77068	Harris	Texas	2081	309	44	25	69								69
77055	Harris	Texas	4471	374	47	8	55								68
77042	Harris	Texas	3952	298	35	23	58								61
77096	Harris	Texas	4692	253	25	14	39								59
77063	Harris	Texas	3855	365	26	24	50								58
77003	Harris	Texas	904	92	19	15	34								56
77043	Harris	Texas	3249	381	28	11	39								52
77079	Harris	Texas	6030	280	37	14	51								52
77489	Harris	Texas	273	95	11	5	16								51
77024	Harris	Texas	7097	262	29	8	37								47
77037	Harris	Texas	1467	428	28	10	38								42
77058	Harris	Texas	2772	164	26	15	41								42
77504	Harris	Texas	2417	325	26	15	41								42
77027	Harris	Texas	2598	119	21	10	31								41
77059	Harris	Texas	4813	117	21	2	23								41
77547	Harris	Texas	782	258	30	9	39								40
77030	Harris	Texas	1997	72	20	12	32								37
77032	Harris	Texas	785	220	20	14	34								35
77081	Harris	Texas	810	49	2	0	2								25
77098	Harris	Texas	2072	74	8	2	10								22

HCDD DATA

SOURCES: US Loan Data and COH Tax Foreclosure Data

ZipCode	County	State	Loans		Sub Prime		Foreclosure		Foreclosure +		Tax Foreclosure	COH	Lending
			March 08	March 08	Loans	March 08	March 08	REO	REO	Foreclosure			
77401	Harris	Texas	4445	119	16	6	22						22
77050	Harris	Texas	263	117	12	4	16						16
77094	Harris	Texas	2538	49	7	4	11					1	12
77046	Harris	Texas	199	9	0	4	4						4
77010	Harris	Texas	35	4	2	0	2					0	2
77081	Harris	Texas	810	2	2	0	2						2
77357	Harris	Texas	43	7	1	0	1						1
			471,704	74,977	9,029	3,855	12,884					7,626	20,510