

NSP3 - PONTIAC

Program Year (PY) 2010 Annual Action Plan

Substantial Amendment for Neighborhood Stabilization Program 3-Pontiac (NSP3-P)

Public Law 111-203, 2010

Federal Register Notice #5447-N-01

October 19, 2010

Catalog of Federal Domestic Assistance #14-218 (CDBG)

Grant Number TBD

DUNS #136-200-362

CAGE/NCAGE# 39523

To be submitted to:

U.S. Department of Housing & Urban Development
Office of Community Planning and Development
Michigan State Office
McNamara Federal Building Floors 16 & 17
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Detroit MI 48226

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EQUAL OPPORTUNITY PROGRAMS/ACTIVITIES

Table of Contents

	Page
Executive Summary	1
NSP3 Grantee Information	3
Areas of Greatest Need	3
Definitions and Descriptions	5
Low-Income Targeting	7
Acquisition and Relocation	7
Public Comment	8
NSP Information by Activity	9
Attachment A - General Information	17
Attachment B - Citizen Participation	18
Attachment C - Public Hearing Notice	19
Attachment D - Affidavit of Publication	20
Attachment E - Public Hearing Minutes	21
Attachment F - HUD NSP3-P Planning Data	22
Attachment G - HUD NSP3-P Map	29
Attachment H - HUD NSP3 Data Dictionary	30
Appendix: NSP3 Action Plan Contents Checklist	31

Oakland County, Michigan
PY 2010 Annual Action Plan Substantial Amendment for
Neighborhood Stabilization Program 3-Pontiac (NSP3-P)

Executive Summary

Introduction - The Neighborhood Stabilization Program 3 (NSP3) was 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. Oakland County is submitting a substantial amendment to its PY 2010 Community Development Block Grant (CDBG) program for a \$1,410,621 NSP3 grant through the U.S. Department of Housing and Urban Development (HUD). The substantial amendment incorporates HUD prescribed data to identify the best use of funds toward critical housing needs in the City of Pontiac's highest risk areas due to foreclosure, abandonment and blight. Oakland County Community & Home Improvement Division is the NSP3-P grantee. The Substantial Amendment is available for review at the Division website at <http://www.oakgov.com/chi>.

HUD Areas of Greatest Need Targeting - NSP3-P requires funds to be concentrated in areas of greatest need. HUD required Oakland County to use the HUD Foreclosure Need website (<http://www.huduser.org/portal/datasets/NSP.html>) to submit census tract block group locations of Pontiac's areas of greatest need. Scores range from 1 to 20, with a score of 20 indicating areas with the HUD determined greatest need. Oakland County's NSP3-P application targets areas of greatest need with HUD risk scores of 19 to 20 (17 = statewide minimum threshold).

Pontiac Census Tracts with NSP3 Eligible Areas

Census Tract	Block Group	HUD Risk Score	Census Tract	Block Group	HUD Risk Score	Census Tract	Block Group	HUD Risk Score
14100	1	19	14170	1	20	14230	2	20
14100	2	19	14170	2	20	14230	3	20
14110	1	19	14170	3	20	14240	1	20
14110	2	19	14170	4	20	14240	2	20
14120	1	20	14170	5	20	14240	3	20
14130	1	20	14180	1	20	14240	4	20
14130	2	20	14180	2	20	14240	5	20
14130	3	20	14180	3	20	14240	6	20
14130	4	20	14190	1	20	14250	1	20
14140	1	20	14200	1	20	14250	2	20
14140	2	20	14200	2	20	14260	1	19
14140	3	20	14200	3	20	14260	2	19
14140	4	20	14200	4	20	14260	3	19
14150	1	20	14210	1	20	14260	4	19
14150	2	20	14210	2	20	14260	5	19
14150	3	20	14210	3	20	14260	6	19
14150	4	20	14210	4	20	14270	1	20
14150	5	20	14220	1	20	14270	2	20
14160	1	20	14220	2	20	14270	3	20
14160	2	20	14220	3	20	14270	4	20
14160	3	20	14220	4	20	14270	5	20
14160	4	20	14220	5	20	14270	6	20
14160	5	20	14220	6	20			
14160	6	20	14230	1	20			

Eligible Activities - Oakland County's NSP3-P application includes three eligible activities including:

Activity	Targeted Locations	Proposed Accomplishments
Financing Mechanisms - Homebuyer Program	HUD risk scores of 19 to 20	<50% Area Median Income (5 houses)
Demolition	HUD risk scores of 19 to 20	69 blighted residential structures
Administration	N/A	Maximum 10%

Budget - Oakland County's NSP 3-P application budget is as follows:

Activity	Budgeted Amount	Spending Performance
Financing Mechanisms - Homebuyer Program (Required Minimum 25% of Grant)	\$352,657	50% spent in two years 100% spent in three years
Demolition (65% of Grant)	\$916,903	
County Administration (Maximum 10% of Grant)	\$141,061	
Total	\$1,410,621	

1. NSP3-P Grantee Information

NSP3-P Program Administrator Contact Information	
Name (Last, First)	Rieth, Karry
Email Address	riethk@oakgov.com
Phone Number	248 858-5403
Mailing Address	Oakland County Community & Home Improvement Division 250 Elizabeth Lake Road Suite 1900 Pontiac MI 48341-0414

2. Areas of Greatest Need

Map Submission - The maps generated through the HUD NSP3 Mapping Tool for Preparing Action Plan website <http://www.huduser.org/NSP/NSP3.html> are included as Attachment D.

Data Sources Used to Determine Areas of Greatest Need

Describe the data sources used to determine the areas of greatest need.

NSP3 requires funds to be concentrated in areas of greatest need. HUD required Oakland County to use the HUD Foreclosure Need website (<http://www.huduser.org/portal/datasets/NSP.html>) to submit census tract block group locations of Pontiac's areas of greatest need. Scores range from 1 to 20, with a score of 20 indicating areas with the HUD determined greatest need. The City of Pontiac's NSP3 areas of greatest need include the whole City and have HUD risk scores of 19 to 20 (17 = statewide minimum threshold).

Determination of Areas of Greatest Need and Applicable Tiers

Describe how the areas of greatest need were established.

NSP3 requires that funds be concentrated in highest need census tracts in sufficient amounts to achieve significant and durable impact. To comply with the Dodd-Frank Act objectives, Oakland County has identified City of Pontiac areas of greatest need. The City of Pontiac contains census tract block groups with HUD risk scores of 19 and 20 which allow funds to be directed in areas with the highest percentage of home foreclosures, highest percentage of homes financed by subprime mortgage related loans and likely to face a significant rise in the rate of home foreclosures.

Pontiac Census Tracts with NSP3 Eligible Areas

Census Tract	Block Group	HUD Risk Score	Census Tract	Block Group	HUD Risk Score	Census Tract	Block Group	HUD Risk Score
14100	1	19	14170	1	20	14230	2	20
14100	2	19	14170	2	20	14230	3	20
14110	1	19	14170	3	20	14240	1	20
14110	2	19	14170	4	20	14240	2	20
14120	1	20	14170	5	20	14240	3	20
14130	1	20	14180	1	20	14240	4	20
14130	2	20	14180	2	20	14240	5	20
14130	3	20	14180	3	20	14240	6	20
14130	4	20	14190	1	20	14250	1	20
14140	1	20	14200	1	20	14250	2	20
14140	2	20	14200	2	20	14260	1	19
14140	3	20	14200	3	20	14260	2	19
14140	4	20	14200	4	20	14260	3	19
14150	1	20	14210	1	20	14260	4	19
14150	2	20	14210	2	20	14260	5	19
14150	3	20	14210	3	20	14260	6	19
14150	4	20	14210	4	20	14270	1	20
14150	5	20	14220	1	20	14270	2	20
14160	1	20	14220	2	20	14270	3	20
14160	2	20	14220	3	20	14270	4	20
14160	3	20	14220	4	20	14270	5	20
14160	4	20	14220	5	20	14270	6	20
14160	5	20	14220	6	20			
14160	6	20	14230	1	20			

Areas of Greatest Need Target Markets - The County has identified the Area of Greatest Need Target Market as the City of Pontiac. The market was determined based upon census tract block groups in the City of Pontiac having a HUD NSP3 Risk Score of 19 to 20. HUD provided data as a tool for both neighborhood targeting and to help inform NSP3 strategy development. Detailed data is provided in Attachment F and G.

3. Definitions and Descriptions

Definitions

Term	Definition
Blighted Structure	<p>In order to arrest and reverse economic decline and neighborhood disinvestment, and to foster and promote neighborhoods in viable, standard condition, the Substantial Amendment proposes the elimination of blighted structures. The October 6, 2008, Federal Register Notice defined "blighted structure" under NSP as <i>"structure is blighted when it exhibits objectively determinable signs of deterioration sufficient to constitute a threat to human health, safety, and public welfare."</i> Oakland County is an urban county within a home rule state. As such the County does not impose its own definition of blighted structure on local units of government. State of Michigan Law defines "blighted" (Public Act 381 of 1996, MCL 125.2562(e)) as a property that meets any of the following criteria:</p> <ul style="list-style-type: none"> • Has been declared a public nuisance in accordance with a local housing, building, plumbing, fire, or other related code or ordinance; is an attractive nuisance to children because of physical condition, use, or occupancy; is a fire hazard or is otherwise dangerous to the safety of persons or property; or has had the utilities, plumbing, heating, or sewerage permanently disconnected, destroyed, removed, or rendered ineffective so that the property is unfit for intended use. <p>The City of Pontiac maintains its own definition of "blighted structure" and will be responsible for inspecting NSP 3-P properties and verifying blighted status of each eligible structure. In the absence of local code Oakland County will use the state of Michigan definition of blighted structure as a minimum standard.</p>

Descriptions

Affordable Rents

Oakland County will use the HOME Investment Partnership Act (HOME) standards at 24 CFR 92.252(a), (c), (e), and (f) to define affordable rents:

- The maximum rent will be the lesser of: (a) the fair market rent for existing housing for comparable units in the area as established by HUD; or (b) a rent that does not exceed 30% of the adjusted income of a family whose annual income equals 65% of the median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit.
- The maximum monthly allowances for utilities and services will be those used by the local housing authority.
- Units assisted with NSP3-P funding must meet the affordability requirements for not less than the applicable period specified without regard to the term of any loan or mortgage or the transfer of ownership. The affordability requirements will be imposed by use of a deed restriction on the assisted property.

2012 HOME Program Rents

Detroit-Warren-Livonia, MI HUD Metro FMR Area (DET-FMR)

Detroit-Warren-Livonia, MI HUD Metro Fair Market Rent (FMR) Area							
Program	Efficiency	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	6 Bed
Low HOME Rent Limit	594*	665*	798*	923*	997*	1135*	1242*
High HOME Rent Limit	594*	676*	809*	968*	997*	1147*	1296*
Fair Market Rent	586	667	798	954	984	1132	1279
50% Rent Limit	572	613	735	849	947	1045	1142
65% Rent Limit	724	777	934	1070	1174	1277	1380

* HOME Program Rent held at last year's level.

Long-Term
Affordability

Oakland County will minimally adopt HOME program standards for ensuring continued affordability as defined at CFR 92.254. NSP3-P assisted housing must meet affordability requirements for not less than the applicable period after project completion:

Homeownership Affordability Periods

Homeownership Assistance NSP Amount Per Unit	Minimum Affordability Period
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

Oakland County will impose recapture requirements that comply with 24 CFR Part 92.254 5 (i) (ii) standards and have been set forth in the County's currently approved Consolidated Plan. Recapture provisions must ensure that the County recoups all or a portion of NSP3-P assistance to the homebuyers, if the housing does not continue to be the principal residence for the duration of the affordability period. The County will structure recapture provisions based on program design and market conditions. The period of affordability is based upon the total amount of NSP3-P subject to recapture described in paragraph (a)(5)(ii)(A)(5). In establishing its recapture requirements, Oakland County is subject to the limitation that when the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit, and there are no net proceeds or the net proceeds are insufficient to repay the NSP3-P investment due, Oakland County can only recapture the net proceeds, if any. The net proceeds are the sales price minus superior loan repayment (other than NSP3-P funds) and any closing costs. Oakland County may recapture the entire amount of the NSP3-P investment from the homeowner. The NSP3-P investment that is subject to recapture is based on the amount of NSP3-P assistance that enabled the homebuyer to buy the dwelling unit. This includes any NSP3-P assistance that reduced the purchase price from fair market value to an affordable price, but excludes the amount between the cost of producing the unit and the market value of the property (i.e. development subsidy). The recaptured funds must be used to carry out NSP3-P-eligible activities. Notwithstanding § 92.214 (a) (6), to preserve the affordability of housing that was previously assisted with NSP funds and subject to the requirements of § 92.254(a).

Housing
Rehabilitation
Standards

Minimally all NSP3-P funded activities will be completed in compliance with MI Residential Code and meet Certificate of Occupancy requirements, Lead Paint Hazard Reduction requirements (HUD 24 CFR Part 35 and MI Public Act 368 of 1978, as amended, and address all environmental review record mitigation issues. Optional standards apply including:

- Energy Efficiency measures, shall be guided by a Home Energy Rating Standards (HERS) audit. Whenever possible/practical, all required or optional improvements shall be implemented to promote energy efficiency. Replacement of aging household equipment, fixtures or structural components, e.g. roof, windows, doors, HVAC, water heater, stove, refrigerator, washer, dryer, electrical or plumbing service, flooring and cabinets shall be with Energy Star-46 labeled products. Window treatments (limited to shades and blinds) to provide privacy or enhance energy efficiency. Water efficient toilets, showers, and faucets, such as those with the WaterSense label must be installed.
- Exterior improvements (siding, trim, landscaping) to address aged or "eyesore" conditions to enhance desirability and surrounding neighborhood property values.
- Barrier-Free Access or visibility improvements when requested by eligible homebuyer.
- Changes to the dwelling unit floor plan to more closely accommodate modern use patterns
- Where relevant, mitigate the impact of disasters e.g., earthquake, hurricane, flooding, fires.

4. Low-Income Targeting

Low-Income Set-Aside Amount

Identify the estimated amount of funds appropriated or otherwise made available under the NSP3-P to be used to provide housing for individuals or families whose incomes do not exceed 50 percent of area median income.

Total low-income set-aside percentage (must be no less than 25 percent): 25%

Total funds set aside for low-income individuals = \$352,657

Meeting Low-Income Target

Provide a summary that describes the manner in which the low-income targeting goals will be met.

Oakland County will use 25% of NSP3-P funds to provide financing mechanisms to purchase and rehabilitate vacant and foreclosed properties for housing that serves persons at or below 50% AMI. It is anticipated that \$352,657 will be used for this purpose. This targeted assistance may be provided as homebuyer or rehabilitation assistance. Targeted assistance to low-income homebuyers may include closing costs and down payment assistance. The Oakland County Taskforce on Homelessness and Affordable Housing (the local Continuum of Care), and other local housing and social service providers will be engaged to identify special needs populations that may be underserved by current availability of affordable housing.

5. Acquisition and Relocation

Demolition or Conversion of LMI Units

Does the grantee intend to demolish or convert any low- and moderate-income dwelling units (i.e., = 80% of area median income)?

Yes. The City of Pontiac will ensure compliance with anti-displacement through demolition of vacant blighted abandoned or foreclosed residential properties.

If yes, fill in the table below.

Question	Number of Units
The number of low- and moderate-income dwelling units—i.e., = 80% of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.	It is expected that after a thorough inspection the demolition of approximately 69 vacant blighted residential properties may significantly impact the census tracts block groups with HUD NSP3 Risk Scores of 19 and 20.
The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., = 120% of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).	N/A
The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50% of area median income.	N/A

6. Public Comment

Citizen Participation Plan

Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment or abbreviated plan.

The Oakland County Contract Review process and subsequent request for Board of Commissioner authorization provided opportunities for the following citizen participation:

- Board of Commissioners Planning and Building Committee Meeting, June 12, 2012
- Board of Commissioners Finance Committee Meeting, June 14, 2012 and

The 15-day comment period from May 16 - May 31, 2012 was published in the *Oakland Press* and through notices to the City of Pontiac. The 2010 Annual Action Plan substantial amendment was posted on Community & Home Improvement web page at www.oakgov.com/chi from May 16 - 31, 2012. NSP3 rules require NSP3 Quarterly Performance Reports to be completed within 30 days of quarter end. The NSP3 QPR will be posted on the County website to be shared with citizens.

Summary of Public Comments Received - See Attachment B.

7. NSP Information by Activity - Oakland County proposes the following NSP3-P activities; however, the County reserves the right to shift funding from one activity to another according to availability of suitable properties, agency capacity, project readiness, and ability to meet timeliness requirements. Oakland County anticipates the generation of NSP3-P program income (net proceeds from resale). Programming and reuse of program income for any activity already described in this Substantial Amendment (SA) has been contemplated, therefore, such reallocations shall not be considered as SA amendments and are not subject to further public comment requirements. Oakland County will track expenditures and outcomes in the Disaster Recovery Grant Reporting (DRGR) system. Program income received will be tracked, used first and receipted for in DRGR. Due to the emergency nature of NSP3-P and desire to implement and complete projects and activities rapidly, the reallocation of funding between activities already described in the SA is also anticipated. Therefore, such reallocations shall not be considered as amendments to the SA and shall not be subject to further public comment requirements. The addition of activities not already described in this SA or changes to the Oakland County NSP3-P areas of greatest need shall be treated as a SA to this NSP3-P plan and are subject to a 15-day public comment period. Any SA amendment, with or without a required public comment period as described above, shall be subject to applicable local and federal requirements, reviews and approvals. The Community & Home Improvement Division along with corresponding local agencies are identified as responsible parties in the activities described in the SA. The subsequent engagement of other municipal departments, non-profit service providers, contractors is possible and anticipated. These engagements, if any, shall not be subject to public comment requirements. The following other federal requirements apply:

- Environmental review
- Uniform Relocation Act (URA) and tenant protections
- Davis Bacon labor standards
- Lead based paint
- Fair housing and Equal opportunity, including Section 504 which provides that no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Office of Management and Budget (OMB) circulars and regulations apply including A-87: Cost Reasonableness and Eligibility, A-133: Audits, and Part 85/Part 84: Financial Management Systems and Procurement.

Activity Number 1

Activity Name	NSP Financing Mechanisms
Uses	Eligible Use A: Financing Mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties
CDBG Activity or Activities	NSP3: Financing mechanisms CDBG: Downpayment Loan Financing and Rehabilitation Loan Financing, Direct home ownership assistance (24 CFR 570.206 and 24 CFR 570.202)
National Objective	Low/income (LI) = 50% Area Median Income (AMI)
Activity Description	<p>The NSP3-P Homebuyer Program offers down payment assistance and rehabilitation assistance for the purchase of foreclosed, abandoned, or vacant residential properties in areas of greatest need census tract block groups with HUD Risk Scores of 19-20 within the City of Pontiac. Per NSP3 rules, when a property meets both foreclosed and either abandoned or vacant definitions, the County will treat it as foreclosed. These properties must be occupied by a qualified homebuyer as a primary residence. Homebuyers are required to complete 8 hours of pre and post purchase housing counseling with HUD approved housing counselors. Applicants must satisfy standard credit criteria and qualify for a fixed rate first mortgage. No arms or balloons allowed. All NSP3 mortgages must demonstrate that property taxes and homeowner insurance will be escrowed as part of the first mortgage. The purchase price may not exceed \$226,100. Properties acquired under this program will have a purchase discount of at least 1% from appraised value. The appraisal will be done within 60 days of the final offer to purchase. Homes purchased must be for the purchaser occupant. All homes must be permanently affixed to a slab, crawl space, or basement and may not be located in a 100 year flood plain. Homes purchased with NSP3 funds may not displace an owner/tenant. Addressing local housing market conditions - 0% deferred loans as soft seconds to households at or below 50% AMI will enable homebuyers to purchase a home that meets Housing Quality Standards with improvements that meet the MI Residential Code and keep monthly mortgage payments affordable. Range of interest rates - 0% deferred as soft second. Duration or term of assistance - Until such time as the owner occupant no longer owns or resides in the unit. Tenure of beneficiaries - Homeowners. Expected benefit to income-qualified persons or households or areas - NSP3 applicants must qualify based upon HUD income guidelines. A minimum of 25% of NSP3 funds will be used for housing individuals and families whose incomes do not exceed 50%AMI. These households must qualify for a 30 year fixed rate mortgage based on 51% of the home's final cost including purchase price and rehabilitation. Oakland County will finance 49% of the cost for down payment assistance and/or rehabilitation. Ensuring continued affordability- Homebuyers must execute a mortgage/mortgage note securing the property as collateral. The total down payment and/or rehabilitation assistance is subject to recapture when ownership is transferred based upon federal affordability requirements. Hiring and contracting - Section 3 of the Housing and Urban Development Act of 1968, (12 U.S.C. 1701u) (Section 3) and implementing regulations at 24 CFR 135 states the purpose of Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low and very low income persons.</p>

Oakland County is committed to providing opportunities for Section 3 business concerns and residents to participate in productive and meaningful employment. Section 3 initiatives under the Homebuyer Program may include a housing rehabilitation element on an address basis. When housing rehabilitation is required, Homebuyer projects are bid to Michigan Residential Builders on the County's Home Improvement contractors list. The County will identify contractors who are Section 3 business concerns based upon their qualifying officers household size and income. These contractors will be included along with non Section 3 business concerns on the bid list for all Homebuyer projects. A secondary strategy that may be employed by the County is the identification of contractors committed to subcontract with Section 3 eligible workers. Section 3 data will also be collected by project on the Section 3 Summary Report Economic Opportunities for Low and Very-Low Income Persons HUD Form 60002 and reported to HUD annually.

Affordable rental housing preferences - Due to current conditions, Oakland County has seen a great deal of private investment in the rental market. The requirement for targeted investment combined with funding constraints and a strong NSP1 Homebuyer Program success rate supports Oakland County's continued strategy of focusing on single family home ownership opportunities.

Location Description			Pontiac Census Tracts with NSP3 Eligible Areas					
Census Tract	Block Group	HUD Risk Score	Census Tract	Block Group	HUD Risk Score	Census Tract	Block Group	HUD Risk Score
14100	1	19	14170	1	20	14230	2	20
14100	2	19	14170	2	20	14230	3	20
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14110	2	19	14170	4	20	14240	2	20
14120	1	20	14170	5	20	14240	3	20
14130	1	20	14180	1	20	14240	4	20
14130	2	20	14180	2	20	14240	5	20
14130	3	20	14180	3	20	14240	6	20
14130	4	20	14190	1	20	14250	1	20
14140	1	20	14200	1	20	14250	2	20
14140	2	20	14200	2	20	14260	1	19
14140	3	20	14200	3	20	14260	2	19
14140	4	20	14200	4	20	14260	3	19
14150	1	20	14210	1	20	14260	4	19
14150	2	20	14210	2	20	14260	5	19
14150	3	20	14210	3	20	14260	6	19
14150	4	20	14210	4	20	14270	1	20
14150	5	20	14220	1	20	14270	2	20
14160	1	20	14220	2	20	14270	3	20
14160	2	20	14220	3	20	14270	4	20
14160	3	20	14220	4	20	14270	5	20
14160	4	20	14220	5	20	14270	6	20
14160	5	20	14220	6	20			
14160	6	20	14230	1	20			

Budget	Source of Funding	Dollar Amount
	NSP3	\$352,657 Pre-Award Costs - The NSP3-P Substantial Amendment anticipates the expenditure of funding for eligible activities prior to the effective date of the grant agreement. In compliance with 24 CFR 570.200(h), these expenditures shall be limited to general planning and administrative costs, or other costs and activities that are in compliance with the Environmental Review Procedures stated in 24 CFR 58. All other activities will commence on or after the date of the grant agreement. These pre-award costs are not anticipated to have any affect on future grants.
Total Budget for Activity		\$352,657 (Required Minimum 25%)
Performance Measures	Approximately 5 <50% AMI Homebuyers Assisted 50% spent in 2 years and 100% spent in 3 years	
Projected Start Date	July 16, 2012	
Projected End Date	July 15, 2015	
Responsible Organization		
Name	Oakland County Community & Home Improvement	
Location	250 Elizabeth Lake Road Suite 1900 Pontiac, MI 48341-0414	
Administrator Contact Info	Karry L. Rieth 248 858-5403 riethk@oakgov.com	

Activity Number 2

Activity Name	Demolition of Blighted Structures
Uses	Eligible Use D: Demolition
CDBG Activity or Activities	NSP: Demolition of blighted structures. CDBG: Clearance and remediation activities (24 CFR 570.201)
National Objective	24 CFR 570.201(d) Clearance for blighted structures only.
Activity Description	<p>Per NSP3 rules, as a subrecipient, the City of Pontiac will demolish blighted residential properties only. The structures must be municipally owned or slated for court ordered demolition and be located in targeted areas of greatest need with HUD Risk Scores of 19-20. Addressing local housing market conditions - These properties will be demolished because they are so blighted that the required investment to bring them up to code is much greater than the expected sales price. Range of interest rates - N/A Duration or term of assistance - N/A Tenure of beneficiaries - N/A Expected benefit to income-qualified persons or households or areas - The expected benefit is that low-, moderate- and middle-income households will benefit from the elimination of vacant blighted structures, that pose health and safety hazards and are often associated with criminal activity. This activity will not be used to meet the requirement that 25% of the NSP funds be used to assist households making no more than 50% of the area median income. Ensuring continued affordability - N/A Hiring and contracting requirements - Section 3 of the Housing and Urban Development Act of 1968, (12 U.S.C. 1701u) (Section 3) and implementing regulations at 24 CFR 135 states the purpose of Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low and very low income persons. The Oakland County Community & Home Improvement Division is committed to providing opportunities for Section 3 business concerns and residents to participate in productive and meaningful employment. Under the Demolition of Blighted Structures activity, the County will provide technical assistance to the City of Pontiac on Section 3 requirements. The City will be required to reach out to small businesses in the "vicinity" of their targeted areas to acquire services needed for the implementation of their programs. The City of Pontiac will also encourage any business that is awarded contracts to utilize the workforce in the neighborhood in which they are working. They will be required to work closely with these businesses to reach out to the local workforce as their need for additional employees arises. The City will be required to include Section 3 information in their solicitation process, contracting documents, procurement advertisements and flyers posted at the worksites. Section 3 data will also be collected by project on the Section 3 Summary Report Economic Opportunities for Low and Very-Low Income Persons HUD Form 60002 and reported to HUD annually. Affordable rental housing preferences - Due to current conditions, Oakland County has seen a great deal of private investment in the rental market. The requirement for targeted investment combined with funding constraints and a strong NSP1 Homebuyer Program success rate supports Oakland County's continued strategy of focusing on single family home ownership opportunities.</p>

Location Description			Pontiac Census Tracts with NSP3 Eligible Areas					
Census Tract	Block Group	HUD Risk Score	Census Tract	Block Group	HUD Risk Score	Census Tract	Block Group	HUD Risk Score
14100	1	19	14170	1	20	14230	2	20
14100	2	19	14170	2	20	14230	3	20
14110	1	19	14170	3	20	14240	1	20
14110	2	19	14170	4	20	14240	2	20
14120	1	20	14170	5	20	14240	3	20
14130	1	20	14180	1	20	14240	4	20
14130	2	20	14180	2	20	14240	5	20
14130	3	20	14180	3	20	14240	6	20
14130	4	20	14190	1	20	14250	1	20
14140	1	20	14200	1	20	14250	2	20
14140	2	20	14200	2	20	14260	1	19
14140	3	20	14200	3	20	14260	2	19
14140	4	20	14200	4	20	14260	3	19
14150	1	20	14210	1	20	14260	4	19
14150	2	20	14210	2	20	14260	5	19
14150	3	20	14210	3	20	14260	6	19
14150	4	20	14210	4	20	14270	1	20
14150	5	20	14220	1	20	14270	2	20
14160	1	20	14220	2	20	14270	3	20
14160	2	20	14220	3	20	14270	4	20
14160	3	20	14220	4	20	14270	5	20
14160	4	20	14220	5	20	14270	6	20
14160	5	20	14220	6	20			
14160	6	20	14230	1	20			
Budget			Source of Funding		Dollar Amount			
			NSP3		\$916,903 Pre-Award Costs - This NSP3-P Substantial Amendment anticipates the expenditure of funding for eligible activities prior to the effective date of the grant agreement. In compliance with 24 CFR 570.200(h) these expenditures shall be limited to general planning and administrative costs, or other costs and activities that are in compliance with the Environmental Review Procedures stated in 24 CFR 58. All other activities will commence on or after the date of the grant agreement. These pre-award costs are not anticipated to have any affect on future grants.			
Total Budget for Activity					\$916,903 (65% of Grant)			
Performance Measures			Approximately 69 blighted residential structures cleared 50% spent in 2 years and 100% spent in 3 years					
Projected Start Date			July 16, 2012					
Projected End Date			July 15, 2015					
Responsible Organization								
Name			Oakland County Community & Home Improvement					
Location			250 Elizabeth Lake Road Ste 1900 Pontiac, MI 48341-0414					
Administrator Contact Info			Karry L. Rieth 248 858-5403 riethk@oakgov.com					

Activity Number 3

Activity Name	Administration	
Uses	X	Eligible Use A: Financing Mechanisms
	N/A	Eligible Use B: Acquisition and Rehabilitation
	N/A	Eligible Use C: Land Banking
	X	Eligible Use D: Demolition
	N/A	Eligible Use E: Redevelopment
CDBG Activity or Activities	NSP: 10% of initial allocation and 10% of program income, to be used for general administration and planning activities (Federal Register, Vol. 73, No. 194, II. H.) CDBG: 24 CFR 570.205 and 24 CFR 570.206	
National Objective	To administer activities that benefit low and moderate income persons under 24 CFR 570.208(a)(2) and potentially under 24 CFR 570.208(a)(1) (up to 120% of AMI)	
Activity Description	Program administration costs associated with implementation of the Oakland County Neighborhood Stabilization Program 3 (NSP3). Funding for general grant administration and planning activities.	
Location Description	Oakland County Community & Home Improvement 250 Elizabeth Lake Rd Ste 1900 Pontiac, MI 48341-0414	
Budget	Source of Funding	Dollar Amount
	NSP3	\$141,061 Pre-Award Costs - This NSP3 Substantial Amendment anticipates the expenditure of funding for eligible activities prior to the effective date of the grant agreement. In compliance with 24 CFR 570.200(h) these expenditures shall be limited to general planning and administrative costs, or other costs and activities that are in compliance with the Environmental Review Procedures stated in 24 CFR 58. All other activities will commence on or after the date of the grant agreement. These pre-award costs are not anticipated to have any affect on future grants.
Total Budget for Activity		\$141,061 (Maximum 10%)
Performance Measures	50% spent in 2 years & 100% spent in 3 years	
Projected Start Date	July 16, 2012	
Projected End Date	July 15, 2015	
Responsible Organization		
Name	Oakland County Community & Home Improvement	
Location	250 Elizabeth Lake Road Ste 1900 Pontiac, MI 48341-0414	
Administrator Contact Info	Karry L. Rieth 248 858-5403 riethk@oakgov.com	

8. Certifications for State and Entitlement Communities

- (1) **Affirmatively furthering fair housing.** The jurisdiction certifies that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-displacement and relocation plan.** The applicant certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.
- (3) **Anti-lobbying.** The jurisdiction must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (4) **Authority of jurisdiction.** The jurisdiction certifies that the consolidated plan or abbreviated plan, as applicable, is authorized under state and local law (as applicable) and that the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (5) **Consistency with plan.** The jurisdiction certifies that the housing activities to be undertaken with NSP funds are consistent with its consolidated plan or abbreviated plan, as applicable.
- (6) **Acquisition and relocation.** The jurisdiction certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the notice for the NSP program published by HUD.
- (7) **Section 3.** The jurisdiction certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (8) **Citizen participation.** The jurisdiction certifies that it is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (9) **Following a plan.** The jurisdiction certifies it is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD. [Only States and entitlement jurisdictions use this certification.]
- (10) **Use of funds.** The jurisdiction certifies that it will comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act and Title XII of Division A of the American Recovery and Reinvestment Act of 2009 by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.

(11) **The jurisdiction certifies:**

- a. that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income; and
- b. The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

(12) **Excessive force.** The jurisdiction certifies that it has adopted and is enforcing:

- a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
- b. A policy of enforcing applicable state and local laws against physically barring entrance to, or exit from, a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

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

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

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

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

(17) **Development of affordable rental housing.** The jurisdiction certifies that it will abide by the procedures described in its NSP3 Abbreviated Plan to create preferences for the development of affordable rental housing for properties assisted with NSP3 funds.

Signature/Chair, Board of Commissioners

Date

Signature/County Executive

Date

Attachment A - General Information

Overview - On October 19, 2010, HUD released the NSP3 Notice with the requirements for the new allocation of NSP funds that were authorized in the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Act provides \$970 million in new NSP funds to states and local governments to continue to assist in the redevelopment of abandoned and foreclosed homes. These Instructions should be used to complete the required submissions for NSP3 funding. An optional template is also included in Part III of these instructions to assist NSP3 grantees in completing Substantial Amendments (for states and entitlement communities) or Abbreviated Plans (non-entitlement communities).

General Information - The NSP3 Notice is available at: <http://hudnsphelp.info/index.cfm?do=viewResource&ResourceID=790>. A webinar on the NSP3 Notice was held on October 19th 2010 and is available at: <http://hudnsphelp.info/learning/index.cfm?do=viewLearningCenter>

Forms of Submission - Oakland County must submit a Substantial Amendment to the current HUD approved Consolidated Plan and 2010 Annual Action Plan describing the NSP3-P program. This paper submission will be sent along with an electronic version of the paper submission via email to the local HUD field office. The NSP 3-P action plan must also be set up in DRGR prior to the deadline for the first required performance report after receiving a grant.

Due Date - The NSP3P Action Plan incorporating all public comments is due to the Detroit HUD field office no later than June 22, 2012.

Submission Format - The Action Plan has nine required sections. Each section includes an explanation of the required topics that must be covered and where applicable, where it is required to provide the information in a particular format. Oakland County is also required to submit a map of the City of Pontiac Areas of Greatest Need.

Page Limits - An adequate and acceptable Substantial Amendment should be no longer than 25 pages. Grantees may incorporate additional information, such as detailed rehabilitation standards, by referencing a website in their plans where the information is posted.

Designing the NSP3-P Action Plan - This NSP3-P Action Plan is intended to reflect the City of Pontiac's vision of how its neighborhoods can become not only more stable, but also more sustainable, inclusive, competitive, and integrated into the overall metropolitan fabric, including access to transit, affordable housing, employers, and services. HUD is encouraging grantees to have small enough target areas for NSP3 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.

Required Sections and Information - Below is a list of required sections and information that must be included in the NSP3-P Action Plan.

- | | |
|---------------------------------|-----------------------------------|
| 1. NSP3-P Grantee Information | 5. Acquisition and Relocation |
| 2. Areas of Greatest Need | 6. Public Comment |
| 3. Definitions and Descriptions | 7. NSP3-P Information by Activity |
| 4. Low-Income Targeting | 8. Certifications |

Supplemental Information: The County provides additional information as attachments:

Attachment A - General Information
Attachment B - Citizen Participation
Attachment C - Public Hearing Notice
Attachment D - Affidavit of Publication

Attachment E - Public Hearing Minutes
Attachment F - HUD NSP3-P Planning Data
Attachment G - HUD NSP3-P Map
Attachment H - HUD NSP3 Data Dictionary

Appendix: NSP 3-P Action Plan Checklist

Attachment B - Citizen Participation

The Neighborhood Stabilization Program 3-Pontiac (NSP3-P)

On October 19, 2010, HUD released a Neighborhood Stabilization Program 3 (NSP3) notice with the requirements for an allocation of NSP funding authorized under the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Act included an additional \$970 million of Neighborhood Stabilization program funding to continue to assist in the redevelopment of abandoned and foreclosed homes. Oakland County is applying for \$1,410,621 of this appropriation to provide eligible projects in areas of greatest need within the City of Pontiac.

The Oakland County Community & Home Improvement Division, in order to meet Citizen Participation requirements established by the U.S. Department of Housing & Urban Development (HUD), is accepting written public comments on the County's NSP3-P program until May 31st. Written comments may be submitted via e-mail or postal mail. The NSP3-P draft application located on this webpage will provide an overview of the County's NSP3-P program. Comments can be addressed to:

Karry L. Rieth, Manager
Oakland County
Community & Home Improvement Division
250 Elizabeth Lake Road Suite 1900
Pontiac MI 48341-0414
E-Mail: riethk@oakgov.com
248 858-5403

The Federal Register notice for NSP3 is at
http://hudnsphelp.info/media/resources/NSP3FederalRegisterNotice_October192010.pdf.

HUD has provided a mapping tool to assist states and local governments in targeting eligible NSP3 census tracts. This mapping tool is available at <http://www.huduser.org/NSP/NSP3.html>.

Source: http://www.oakgov.com/chi/info_pub/

NOTICE OF PUBLIC HEARING

Oakland County Community & Home Improvement Division
hosts a public hearing regarding the
PY 2010 CDBG Substantial Amendment
for the Neighborhood Stabilization Program 3-Pontiac
(NSP 3-P)

**Wednesday
May 16, 2012
9:30 a.m.**

Oakland County Community & Home Improvement Division
Oakland Pointe
250 Elizabeth Lake Road, Suite 1900
Pontiac, Michigan

For more information contact
Oakland County Community & Home Improvement Division
(248) 858-5312



L. BROOKS PATTERSON, COUNTY EXECUTIVE
Equal Opportunity Programs/Activities



Source: <http://www.oakgov.com/chi/>

County of Oakland }
STATE OF MICHIGAN, } ss.

Deborah Caldwell being duly sworn,
deposes and says that I am the *Legal Rep.* of
THE OAKLAND PRESS, a newspaper printed and circulated
daily in Oakland County, Michigan and that I held such
position during the publication of the notice hereto annexed;
that a notice of

Public notice of
which the annexed notice is a true copy, was published in the
said THE OAKLAND PRESS.....

one immediately preceding the
5. of *May* that the annexed printed copy of said notice
was taken from the said newspaper. That the dates of

publication of said notice were.....


May 4, 2012
and further deponent says, not.

Deborah Caldwell
.....

Subscribed and sworn to before me this *9* day of

May A.D. 20 *12*
Trina M. Grown
NOTARY PUBLIC, OAKLAND COUNTY, MICHIGAN

TRINA M. GROWN
NOTARY PUBLIC, STATE OF MI
COUNTY OF LAPEER
MY COMMISSION EXPIRES Mar 30, 2014
ACTING IN COUNTY OF *Oakland*



OAKLAND COUNTY
MICHIGAN

NOTICE OF PUBLIC HEARING

The Oakland County Community & Home Improvement Division
will host a public hearing regarding the



2010 CDBG Substantial Amendment for the Neighborhood Stabilization Program3 Pontiac (NSP3P)

Wednesday
May 16, 2012
9:30 a.m.

Community & Home Improvement
Oakland Pointe
250 Elizabeth Lake Road, Suite 1900
Pontiac, Michigan

For more information contact
Oakland County Community & Home Improvement Division
(248) 858-5312

L. BROOKS PATTERSON, COUNTY EXECUTIVE
Equal Opportunity Programs/Activities

Published May 4, 2012

Attachment E - Public Hearing Minutes

TBD

Attachment F - HUD NSP3-P Planning Data

Neighborhood ID: 6877136

NSP3 Planning Data

Grantee ID: 2612500C, 2649620E

Grantee State: MI

Grantee Name: OAKLAND COUNTY, PONTIAC

Grantee Address:

Grantee Email: lambertg@oakgov.com

Neighborhood Name: City of Pontiac

Date: 2012-03-30 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: 19.76

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 27750

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 83.77

Percent Persons Less than 80% AMI: 65.3

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 or 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: 27586

Residential Addresses Vacant 90 or more days (USPS, March 2010): 2474

Residential Addresses NoStat (USPS, March 2010): 724

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: 8016
Percent of Housing Units with a high cost mortgage between 2004 and 2007: 46.84
Percent of Housing Units 90 or more days delinquent or in foreclosure: 21.61
Number of Foreclosure Starts in past year: 908
Number of Housing Units Real Estate Owned July 2009 to June 2010: 770

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): 180

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): -31.1

Place (if place over 20,000) or county unemployment rate June 2005: 15.1

Place (if place over 20,000) or county unemployment rate June 2010: 29.5

•Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

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

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

A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-83.247356 42.603768 -83.252335 42.603515 -83.266754 42.614760 -83.277054 42.611854 -
83.277569 42.610717 -83.281860 42.610717 -83.287697 42.610717 -83.287354 42.609075 -
83.294735 42.609201 -83.295593 42.614002 -83.305550 42.614002 -83.311901 42.618676 -
83.324776 42.618170 -83.325119 42.625244 -83.333874 42.624991 -83.333874 42.630170 -
83.324947 42.629412 -83.326321 42.650501 -83.334560 42.659969 -83.332672 42.663756 -
83.328896 42.661358 -83.326664 42.661610 -83.327522 42.684076 -83.296280 42.684959 -
83.296280 42.689754 -83.293705 42.688366 -83.293190 42.691394 -83.291302 42.691394 -
83.291473 42.693918 -83.296108 42.693918 -83.296452 42.699217 -83.294907 42.697703 -
83.293362 42.698712 -83.293362 42.699721 -83.291817 42.699847 -83.291473 42.696567 -
-83.285980 42.696567 -83.285809 42.684581 -83.251991 42.685464 -83.249931 42.649238 -
83.247871 42.649112 -83.249073 42.642546

Blocks Comprising Target Neighborhood

261251501002011, 261251410001000, 261251410001001, 261251410001002, 261251410001003,
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Attachment G - HUD NSP3-P Map

 TUESDAY, APRIL 03, 2012



[SiteMap](#) |
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3 SHARE 100

HOME

ABOUT PD&R

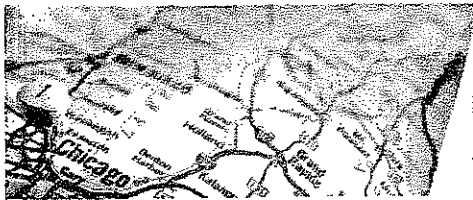
RESEARCH FINDER

PERIODICALS

DATA SETS

QUICK LINKS

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Neighborhood Stabilization Program Grants

The Neighborhood Stabilization Program (NSP) provides grants to address the problems associated with homes that have been foreclosed upon and are creating economic problems for their communities.

Enter an Address, city or state


Select a State Select a County

Map Options : Clear | Reset

Click Mode: Zoom [Info

NSP3 Legend (%): — Tract Outline

LOGOUT



NSP3 Options

12 Current Zoom Level

☐ Show Tracks Outline (Zoom 11+)

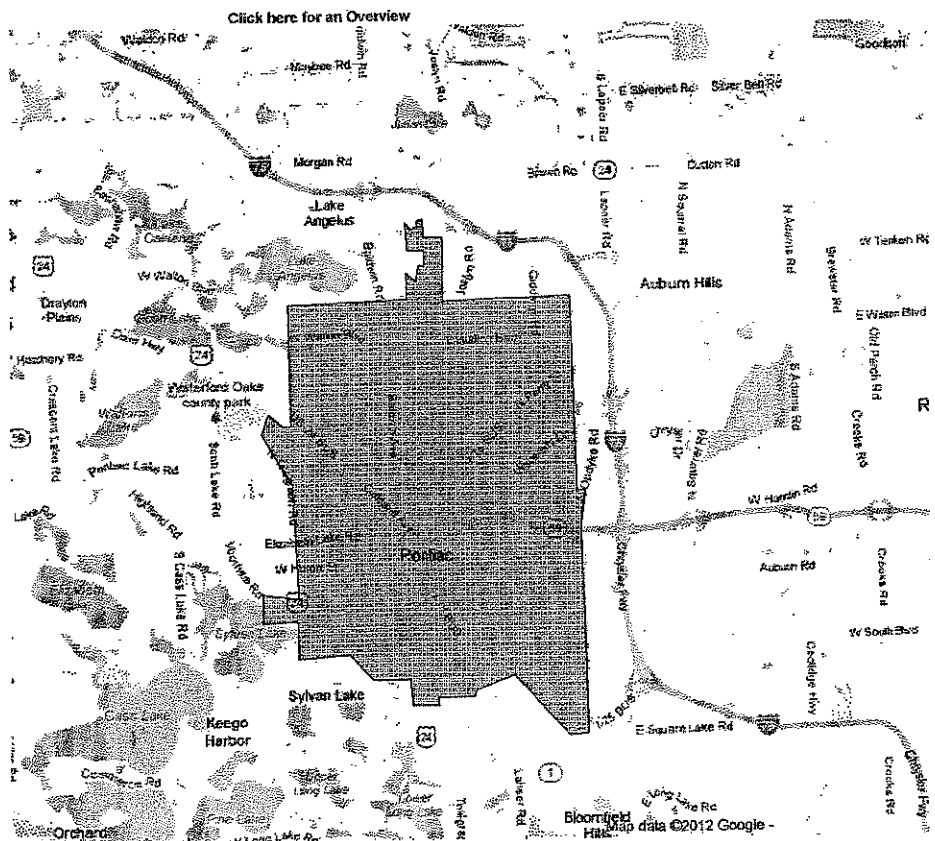
DRAW FINISH

VIEW DATA

VIEW PROJECTS

METHODOLOGY	INSTRUCTIONS
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The NSP3's mapping tool now provides a summary NSP3 score for all projects drawn. Click on "View Projects", which will list all of the projects (target areas) that have data calculated. It shows the NSP3 score for each target area along with the total estimated housing units in that area. At the bottom of the list is a sum of all housing units in all target areas and the NSP3 score for all target areas drawn. Grantees are advised to know their state minimum and if the summary score is less than the state minimum the grantee should delete, add, or revise target areas. Note that if you delete or add, the tool only recalculates after you close the "View Projects" box and reopen it. HUD also advises grantees to think carefully about the size of their target areas in total. If those target areas have a very large number of total housing units relative to the dollars available, HUD will likely ask that the grantee reduce the number and/or size of their target areas.



Attachment H - HUD NSP3 Data Dictionary

NSP3NEED - The NSP3 foreclosure need score for the target geography. See the methodology for the formula for an explanation of how this score was calculated.

NSP3_MIN - The minimum need score for NSP3 targeting eligibility within target area geography's state. 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.

HU2007 - This is an estimated count of housing units in the block group as of 2007.

PCT_LMMI - Percent persons estimated less than 120% AMI in this target geography for purposes of determining Area Benefit eligibility for NSP from Census 2000. To qualify for area benefit under NSP, the target area needs to be 51% or more LMMI.

PCT_LM - Percent persons estimated less than 80% AMI in this target geography for purposes of determining Area Benefit eligibility for CDBG from Census 2000. To qualify for area benefit under CDBG, the target area needs to be 51% or more LM.

USPS_ADD - USPS count of addresses for the identified area in March 2010. Note that this address count is based on a Census Tract address count that is assigned to Block Group parts based on the HU2007 variable above. Note that if the address count is significantly different from the HU2007 variable above, users are advised to use this information 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_VAC - USPS data on addresses not receiving mail in the last 90 days as of March 2010. This 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 is a very good indicator of a current or potential serious blight problem. This number has been adjusted to reduce the count of vacancies due to vacation rentals.

USPS_NS - USPS "NoStat" indicator. This variable 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.

HMDA - Home Mortgage Disclosure Act count of primary mortgages executed between 2004 and 2007. Note that this mortgage count is based on Census Tract level data that is assigned to Block Group parts based on the HU2007 variable above.

HC_RATE - Home Mortgage Disclosure Act data showing the percent of primary mortgages executed between 2004 and 2007 that were high cost. This is the Census Tract level rate.

SDQ_RATE - The estimated rate of mortgages Serious Delinquent (90+ or more days delinquent or in foreclosure) in June 2010. HUD used a July 2010 extract of county level serious delinquency rates from McDash Analytics to develop a predictive model using public data that was available for every Census Tract in the United States.

STARTS - Estimated number of foreclosure starts in the target area in the past year. Each geographic area was allocated its estimated share of foreclosure starts in the state (from Mortgage Bankers Association National Delinquency Survey State Counts of Foreclosure Starts July 2009 to June 2010) based on its estimated share of serious delinquent borrowers (calculated for each geographic area as $HMDA * SDQ_RATE$).

REO - Estimated number of completed foreclosures in the target area in the past year. Each geographic area was allocated its estimated share of completed foreclosures in the state (from RealtyTrac Count of REO completions July 2009 to June 2010) based on its estimated share of serious delinquent borrowers (calculated for each geographic area as $HMDA * SDQ_RATE$).

IMP - Estimated number of properties needed to make an impact in identified target area. There is not magic to this number, it is presuming that a minimum of 20% of REO in a target area would need to be addressed to make a visible impact. The purpose of this variable is to encourage grantees to select target areas that are small enough so that their NSP investment has a chance of stabilizing a neighborhood.

Appendix: NSP3 Action Plan Contents Checklist

The checklist below is an optional tool for NSP3 grantees to help to ensure that all required elements of the NSP3 Substantial Amendment or the Abbreviated Plan are submitted to HUD. This checklist only includes the minimum required elements that must be included in the NSP3 Action Plan and grantees may want to add additional details. This document must be protected, as described above, in order to use the checkboxes in this checklist.

1. NSP3 Grantee Information

	Yes
Did you include the Program Administrator's name, address, phone, and email address?	<input checked="" type="checkbox"/>

2. Areas of Greatest Need

	Yes
Does the narrative description describe how funds will give priority emphasis to areas of greatest need?	<input checked="" type="checkbox"/>
Does the narrative description specifically address how the funds will give priority emphasis to those areas:	<input checked="" type="checkbox"/>
• With the highest percentage of home foreclosures?	<input checked="" type="checkbox"/>
• With the highest percentage of homes financed by subprime mortgage related loan?; and	<input checked="" type="checkbox"/>
• Identified by the grantee as likely to face a significant rise in the rate of home foreclosures?	<input checked="" type="checkbox"/>
Did you create the area of greatest needs map at http://www.huduser.org/NSP/NSP3.html ?	<input checked="" type="checkbox"/>
Did you include the map as an attachment to your Action Plan?	<input checked="" type="checkbox"/>
<i>ONLY Applicable for States:</i> Did you include the needs of all entitlement communities in the State?	N/A

3. Definitions and Descriptions

	Yes
Are the following definitions and topics included in your substantial amendment?:	<input checked="" type="checkbox"/>
• Blighted structure in context of state or local law,	<input checked="" type="checkbox"/>
• Affordable rents,	<input checked="" type="checkbox"/>
• Ensuring long term affordability for all NSP funded housing projects,	<input checked="" type="checkbox"/>
• Applicable housing rehabilitation standards for NSP funded projects	<input checked="" type="checkbox"/>

4. Low-Income Targeting

	Yes
Did you identify the estimated amount of funds appropriated to provide housing that meets the low-income set aside target?	<input checked="" type="checkbox"/>
Did you provide a summary describing how your jurisdiction will meet its low-income set aside goals?	<input checked="" type="checkbox"/>

5. Acquisition & Relocation

	Yes
For all acquisitions that will result in displacement did you specify:	
• The planned activity,	N/A
• The number of units that will result in displacement,	N/A
• The manner in which the grantee will comply with URA for those residents?	N/A

6. Public Comment

	Yes
Did you provide your draft of the NSP3 substantial amendment for a minimum of 15 days for public comment?	<input checked="" type="checkbox"/>
Did you include the public comments you received on the NSP3 substantial amendment in your plan?	TBD

7. NSP Information by Activity

	Check all that apply
Did you include a description of all eligible NSP3 activities you plan to implement with your NSP3 award?	<input checked="" type="checkbox"/>
For each eligible NSP3 activity you plan to implement did you include:	
• Eligible use or uses?	<input checked="" type="checkbox"/>
• Correlated eligible CDBG activity or activities?	<input checked="" type="checkbox"/>
• Associated national objective?	<input checked="" type="checkbox"/>
• How the activity will address local market conditions?	<input checked="" type="checkbox"/>
• Range of interest rates (if any)?	<input checked="" type="checkbox"/>
• Duration or term of assistance?	<input checked="" type="checkbox"/>
• Tenure of beneficiaries (e.g. rental or homeowner)?	<input checked="" type="checkbox"/>
• If the activity produces housing, how the design of the activity will ensure continued affordability?	<input checked="" type="checkbox"/>
• How you will, to the maximum extent possible, provide for vicinity hiring?	<input checked="" type="checkbox"/>
• Procedures used to create affordable rental housing preferences?	<input checked="" type="checkbox"/>
• Areas of greatest need addressed by the activity or activities?	<input checked="" type="checkbox"/>
• Amount of funds budgeted for the activity?	<input checked="" type="checkbox"/>
• Appropriate performance measures for the activity (e.g. units of housing to be acquired, rehabilitated, or demolished for the income levels represented in DRGR)?	<input checked="" type="checkbox"/>
• Expected start and end dates of the activity?	<input checked="" type="checkbox"/>
• Name and location of the entity that will carry out the activity?	<input checked="" type="checkbox"/>

8. Certifications

	Yes
Did you sign and submit the certification form applicable to your jurisdiction?	TBD

9. Additional Documentation

	Yes
Did you include a signed SF-424?	TBD