

# NSP SUBSTANTIAL AMENDMENT

Jurisdiction(s):  
**Oakland County, MI**

Jurisdiction Web Address:  
**<http://www.oakgov.com/chi>**  
(URL where NSP Application materials are posted)

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*A. AREAS OF GREATEST NEED* - Provide summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction. *Note:* An NSP substantial amendment must include the needs of the entire jurisdiction(s) covered by the program; states must include the needs of communities receiving their own NSP allocation. To include the needs of an entitlement community, the State may either incorporate an entitlement jurisdiction's consolidated plan and NSP needs by reference and hyperlink on the Internet, or state the needs for that jurisdiction in the State's own plan. The lead entity for a joint program may likewise incorporate the consolidated plan and needs of other participating entitlement jurisdictions' consolidated plans by reference and hyperlink or state the needs for each jurisdiction in the lead entity's own plan. HUD has developed a foreclosure and abandonment risk score to assist grantees in targeting the areas of greatest need within their jurisdictions. Grantees may wish to consult [this data](#), in developing this section of the Substantial Amendment.

**Response:** The U. S. Department of Housing and Urban Development's (HUD) Neighborhood Stabilization Program (NSP) was authorized by the Housing and Economic Recovery Act of 2008 (HERA). HERA provides \$4 billion in emergency assistance for the redevelopment of abandoned and foreclosed homes including \$3.92 billion in Neighborhood Stabilization Program (NSP) funds to States and Community Development Block Grant (CDBG) entitlements. The purpose of the NSP is to assist states and local governments in addressing the effects of abandoned and foreclosed properties. HUD has implemented the program by relying upon existing CDBG requirements and making appropriate adjustments to accommodate the directives of HERA.


The following NSP application is considered a substantial amendment to the Oakland County 2008 Annual Action Plan and related 2005-2009 Consolidation Plan. The information that follows is in the order and format provided by HUD. The Oakland County Community & Home Improvement Division has been allocated \$17,383,776 in NSP funds to infuse this one time emergency assistance for the redevelopment of abandoned and foreclosed homes into areas of greatest need. Federal regulations were released on September 29, 2008 which included a description of how HUD would target formula allocations to CDBG entitlement jurisdictions based on:

- Number and percentage of home foreclosures
- Number and percentage of homes with subprime mortgages
- Number and percentage of homes in default

The goals of Oakland County's Neighborhood Stabilization Program (NSP) include:

- Reduce foreclosed property vacancies
- Arrest and reverse the decline of neighborhood housing values
- Enhance the stability of neighborhoods negatively impacted by foreclosure and abandonment
- Return vacant foreclosed properties to productive use

Oakland County has experienced a 969% increase in the number of Sheriff Deeds overall from 1998-2007. The entire county has been impacted by the foreclosure crisis. Data indicates that some communities lead in foreclosures, others lead in likely foreclosures because of the presence of high cost mortgages and others have been hardest hit with property value changes. Based upon 1st, 2nd, and 3rd quarter data Oakland County Equalization anticipates a 32% overall increase in 2008 Sheriff Deeds. The Sheriff Deeds- Foreclosures on Mortgages Chart below provides the most current information (10/13/08) on the County's overall foreclosure crisis.

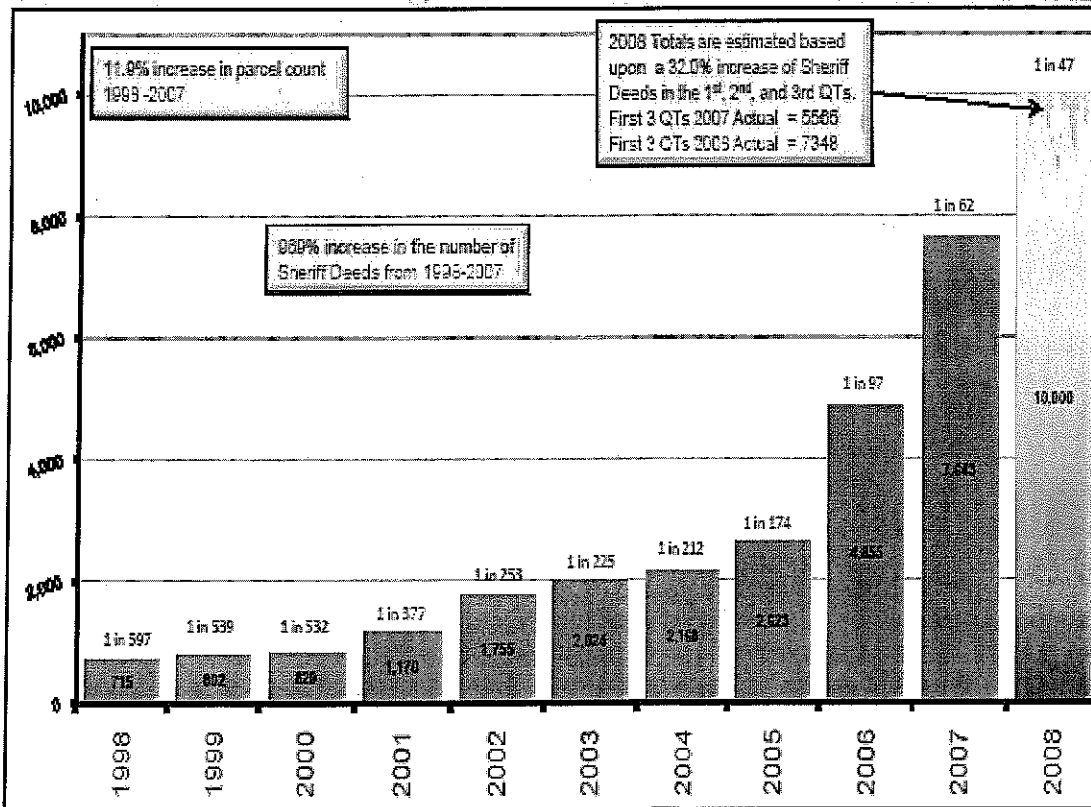


**Oakland County**  
Michigan  
Management & Budget  
Equalization Division

## Sheriff Deeds - Foreclosures on Mortgages

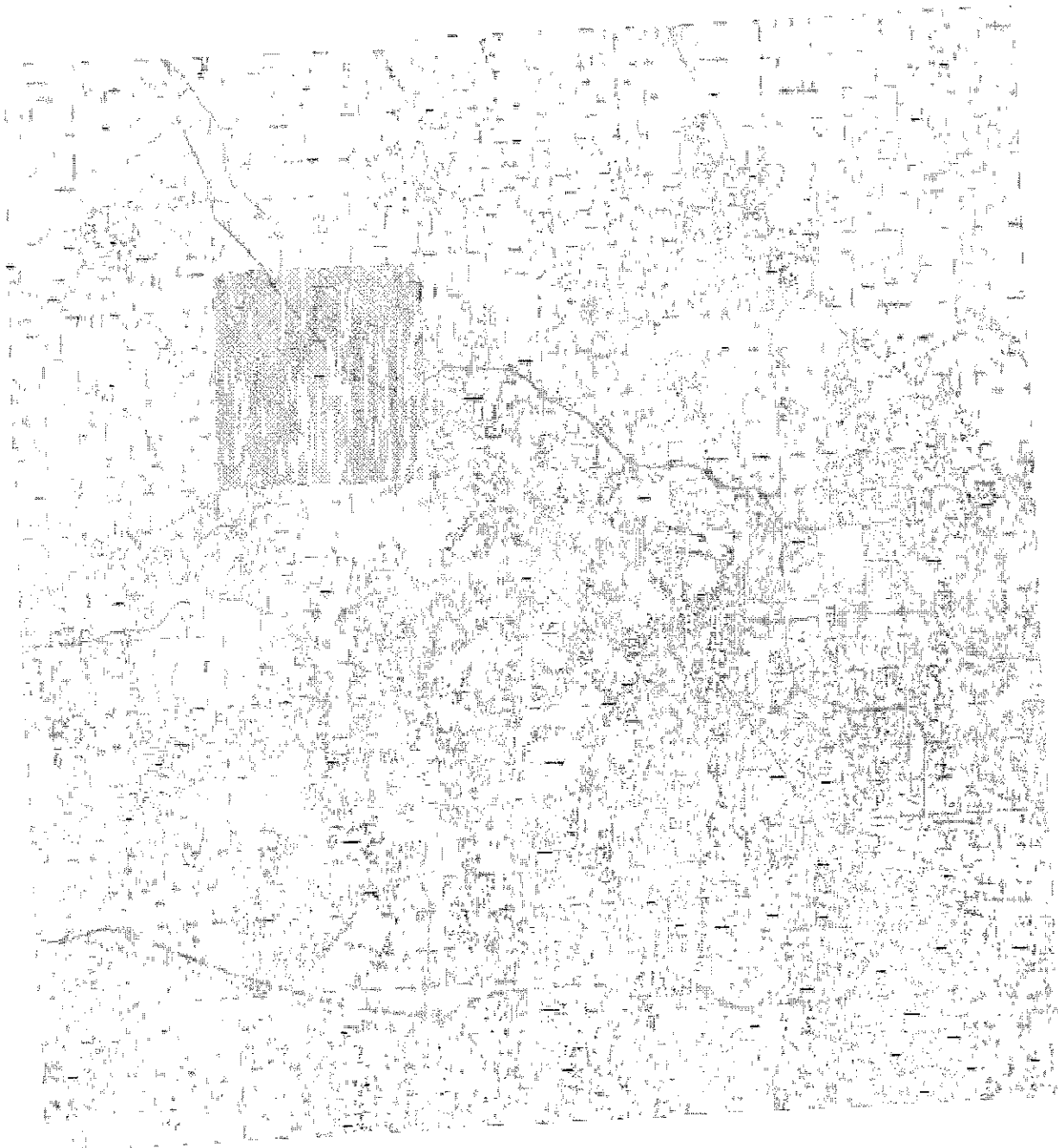
# Oakland County

10-13-08



The following map from Oakland County Equalization provides a graphic representation of the county's overall level of 2008 Sheriff Deeds as of 10/20/08. This information is updated on a monthly basis.

### 2008 Oakland County Sheriff Deeds 10-20-08



Oakland County Equalization

It is evident that all of Oakland County has been affected by the foreclosure crisis. However, in distributing NSP funds, grantees are to give priority emphasis and consideration to those metropolitan areas, metropolitan cities, urban areas, rural areas, low- and moderate-income areas, and other areas with the greatest need, including those—

1. with the greatest percentage of home foreclosures;
2. with the highest percentage of homes financed by subprime mortgage related loan;
3. identified by the State or unit of general local government as likely to face a significant rise in the rate of home foreclosures.

The process to determine the County's areas of greatest need began with an analysis of non-urban county CDBG entitlement communities. HUD indicated that these areas including Farmington Hills, Pontiac, Royal Oak, Southfield, and Waterford Township could receive NSP funds from Oakland County and the State of Michigan. Oakland County considered the needs of Pontiac, Southfield, and Waterford and determined them to be of lower need due to the resources already available to them to address foreclosed properties through NSP. The other communities of Farmington Hills and Royal Oak were not considered to be of highest need compared to those communities that did not have any other available resources to address the effects of abandoned and foreclosed properties.

The first step in narrowing the focus of NSP resources for current urban county participating communities was to analyze data pursuant to the Act and NSP regulation starting with HUD User data on "Middle Income Eligible Areas". This data set indicates whether or not each Census Block Group qualifies as an area of low-, moderate-, and middle-income (LMMI) benefit, where more than 51 percent of the people in the area had incomes less than 120 percent of Area Median Income (AMI). This data was analyzed first based upon the requirement that all NSP funds shall be used to benefit individuals and families whose incomes do not exceed 120 percent of area median income. The following communities contain LMMI eligible benefit areas:

#### OAKLAND COUNTY AREAS OF GREATEST NEED

Cities	Townships	Villages
Auburn Hills	Addison	Holly
Berkley	Brandon	Lake Orion
Birmingham	Commerce	Leonard
Clawson	Groveland	Milford
Farmington	Holly	Oxford
Ferndale	Highland	Wolverine Lake
Hazel Park	Independence	
Keego Harbor	Lyon	
Madison Heights	Milford	
Novi	Oakland	
Oak Park	Orion	
Rochester	Oxford	
Rochester Hills	Rose	
South Lyon	Royal Oak	
Sylvan Lake	Springfield	
Troy	West Bloomfield	
Walled Lake	White Lake	
Wixom		

The following communities do not contain LMMI benefit areas: City of Village of Clarkston, Huntington Woods, Northville, Orchard Lake Village, Pleasant Ridge, Beverly Hills Village, and Franklin Village. Although these communities currently participate in the Oakland County Urban County CDBG program and benefit from county administered programming including the home improvement program for the purposes of NSP they are not identified as areas of greatest need.

As an entitlement, Oakland County distributes funds to participating communities through a formula grant application process. Typically one third of CDBG funds excluding administration are allocated to county administered housing programs that serve all participating communities. The remaining two thirds are allocated to CDBG eligible programs that are administered by participating communities. The County's strategy for allocating NSP funds follows the 2008 CDBG methodology within the targeting parameters of NSP. NSP programs to be administered by Oakland County Community & Home Improvement include administration (10%), public services (3.7%) for housing counseling and the County's Homebuyer Program for Vacant Foreclosed Properties (1/3 of total allocation minus administration and public services) and target areas of greatest need as described above. The County's Homebuyer Program will provide loans to homebuyers for down payment assistance, closing costs, home improvements or other financing associated with purchasing eligible vacant foreclosed single family homes in targeted areas. Sixty percent of the County's Homebuyer Program total budget of \$4,998,467 or \$2,999,080 is reserved to finance homebuyers with incomes at or below 50% of AMI. The remaining funds of \$1,999,387 are earmarked to assist homebuyers with incomes between 51 and 120 percent of AMI. Applicants whose income falls below 50 percent AMI may qualify for an additional \$5,000 toward down payment assistance to maximize homebuyer participation at this lowest income level.

To follow CDBG allocation precedent, two thirds of available NSP funds after administration and housing counseling allocations are targeted specifically to participating communities. Targeting NSP resources within the areas of greatest need communities requires that the county analyze the most current information available including not only the HUD User data but also local data sets including foreclosure statistics from the Oakland County Clerk Register of Deeds sheriff sales as well as property value data from Oakland County Equalization. The three HUD criteria as listed below were addressed by Oakland County through an analysis of the following factor data:

1. **Greatest percentage of home foreclosures:**  
*Local Foreclosures to Local Single Family Housing Units (Factor A)* - Data from the U.S. Census Bureau, SEMCOG, Oakland County Sheriff Deeds/Oakland County Clerk Register of Deeds were used to develop a ratio comparing the number of foreclosures by CVT to the number of single family housing units per CVT. *Local Foreclosures to Total Urban County Foreclosures (Factor B)* - This data set based upon Oakland County Sheriff Deeds/Oakland County Clerk Register of Deeds information compares the percentage of foreclosures in each CVT to the total number of foreclosures in the fifty CDBG participating community's.
2. **Highest percentage of homes financed by subprime mortgage related loan:**  
*Average Subprime Loan Rate by Community (Factor C)* - Information from HUD User based on Home Mortgage Disclosure Act (HMDA) data was used to establish an average subprime loan rate for each CVT.
3. **Likely to face a significant rise in the rate of home foreclosures:**  
*Preliminary Proposed 2009 Percent Change in Residential Property Assessment (Factor D)* - Oakland County Equalization provided data on the proposed 2009 percent decrease in residential property assessments per CVT. This data was key to studying the potential of future foreclosures.  
*Percent of Eligible NSP Areas to Total Eligible NSP Areas (Factor E)* - Data from HUD User was used to identify local populations at or below 120 percent of area median income

The existing precedent set by CDBG for the distribution of funds to participating communities through a formula process was met by the development and use of an NSP formula. Data from the five factors was used to in the  $((A*2) + B+C+D+E)/5$  formula. The resulting calculation was used to achieve a Neighborhood Destabilization Ratio (NDR) for each participating community.

**OAKLAND COUNTY NSP DESTABILIZATION FORMULA ((A\*2) +B+C+D+E)/5**

Community	Neighborhood Destabilization Ratio
Hazel Park	0.12236
Oak Park	0.11764
Royal Oak Twp	0.09431
Madison Heights	0.07694
Ferndale	0.07505
Keego Harbor	0.05574
Village of Holly	0.05472
Village of Ortonville	0.05148
Rose Twp	0.04995
Holly Twp	0.04035
Lathrup Village	0.04026
Village of Lake Orion	0.04021
White Lake Twp	0.03863
West Bloomfield Twp	0.03826
Brandon Twp	0.03706
Highland Twp	0.03608
Auburn Hills	0.03607
Clawson	0.03549
Oxford Twp	0.03517
Commerce Twp	0.03460
Rochester Hills	0.03288
Berkley	0.03186
Troy	0.03098
Independence Twp	0.03097
Walled Lake	0.02943
Orion Twp	0.02862
Village of Wolverine Lake	0.02744
Village of Milford	0.02733
Village of Leonard	0.02669
Groveland Twp	0.02614
Addison Twp	0.02512
Springfield Twp	0.02380
Village of Oxford	0.02360
Milford Twp	0.02294
Farmington	0.02278
South Lyon	0.02167
Sylvan Lake	0.02130
Novi	0.02074
Rochester	0.01885
Wixom	0.01759
Clarkston	0.01739
Lyon Twp	0.01615
Pleasant Ridge	0.01263
Orchard Lake Village	0.01168
Birmingham	0.01035
Huntington Woods	0.00994
Village of Franklin	0.00962
Village of Beverly Hills	0.00423
Northville	-0.00134
Oakland Twp	-0.14473

Source: Factor A - U.S. Census Bureau, SEMCOG, Oakland County Sheriff Deeds/Oakland County Clerk Register of Deeds, Factor B - Oakland County Sheriff Deeds/Oakland County Clerk Register of Deeds, Factor C - HUD User, Factor D - Oakland County Equalization, Factor E - HUD User

The net effect of these steps was the prioritization of funding to the top quartile communities with the highest NDR including:

**OAKLAND COUNTY AREAS OF GREATEST NEED - TOP QUARTILE COMMUNITIES**

Cities		Townships	Villages
Ferndale	Lathrup Village	Holly	Holly
Hazel Park	Madison Heights	Rose	Lake Orion
Keego Harbor	Oak Park	Royal Oak	Ortonville

Although the City of Lathrup Village and the Village of Ortonville do not meet the first step criteria of having "Middle Income Eligible Areas" they are included in the top quartile of areas of greatest need due to the high Neighborhood Destabilization Ratio for each community.

The following HUD User Data is provided for the areas of greatest need communities that are targeted to receive access to the Oakland County Homebuyer Program for Vacant Foreclosed Properties. This information identifies several key elements including the column labeled "Middle Income Eligible". This data indicates whether or not each Census Block Group qualifies as an area of low-, moderate-, and middle-income (LMMI) benefit, where more than 51 percent of the people in the area had incomes less than 120 percent of Area Median Income (AMI). (All HUD-NSP funds shall be used to benefit individuals and families whose incomes do not exceed 120 percent of area median income.)

The following data includes information on:

- The column "Estimated Foreclosure Abandonment Risk Score" provides a score for each neighborhood from 0 to 10, where 0 indicates a very low risk and 10 a very high risk.
- The column labeled "Percent 120 AMI" provides the percent of people in each Census Tract Block Group that had incomes less than 120 percent of Area Median Income.
- The column labeled "Persons 120 AMI" provides the number of people in each Census Tract Block Group that had income less than 120 percent of Area Median Income.
- The column labeled "Total Persons" indicates the total number of people in each Census Tract Block Group.

**NSP AREAS OF GREATEST NEED – CITY OF AUBURN HILLS**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Auburn Hills	140100	1	YES	9	54.70%	651	1,190
Auburn Hills	140600	1	YES	8	63.20%	1,562	2,470
Auburn Hills	140800	1	NO	6	50.00%	2,236	4,470
Auburn Hills	140300	2	YES	8	66.80%	1,159	1,735
Auburn Hills	140300	3	YES	8	76.80%	1,890	2,461
Auburn Hills	140300	1	NO	8	39.90%	1,029	2,580
Auburn Hills	140500	1	YES	6	54.50%	787	1,444
Auburn Hills	140700	1	YES	7	59.30%	1,339	2,259
Auburn Hills	192800	1	NO	1	0.00%	0	1,192

**NSP AREAS OF GREATEST NEED – CITY OF BERKLEY**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Berkley	170100	1	YES	6	52.00%	888	1,708
Berkley	170100	2	YES	6	58.70%	705	1,201
Berkley	170300	1	YES	6	56.10%	856	1,525
Berkley	170300	2	YES	6	56.50%	646	1,144
Berkley	170200	1	YES	6	63.90%	526	823
Berkley	170200	2	YES	6	64.00%	853	1,332
Berkley	170200	3	YES	6	68.50%	843	1,231
Berkley	170400	2	YES	6	64.80%	578	892
Berkley	170400	4	YES	6	52.50%	502	956
Berkley	170400	5	YES	6	52.50%	239	455
Berkley	170400	1	NO	6	46.30%	275	594
Berkley	170400	3	NO	6	44.20%	458	1,036
Berkley	170000	1	NO	5	18.00%	134	744
Berkley	170000	2	NO	5	50.00%	463	926
Berkley	170000	3	NO	5	45.60%	440	964

**NSP AREAS OF GREATEST NEED – CITY OF BIRMINGHAM**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Birmingham	152900	1	YES	8	51.40%	551	1,071
Birmingham	152900	2	NO	8	35.50%	197	555
Birmingham	152900	3	NO	8	49.80%	266	534
Birmingham	152900	4	NO	8	43.10%	569	1,319
Birmingham	153000	1	YES	7	54.00%	628	1,164
Birmingham	153000	2	NO	7	42.40%	436	1,029
Birmingham	153300	1	NO	7	19.00%	153	804
Birmingham	153300	2	NO	7	27.90%	330	1,184
Birmingham	153300	3	NO	7	37.20%	390	1,048
Birmingham	152700	1	NO	5	26.80%	156	582
Birmingham	152700	2	NO	5	10.10%	55	546
Birmingham	152700	3	NO	5	15.00%	131	875
Birmingham	152700	4	NO	5	16.30%	133	814
Birmingham	153100	1	NO	6	3.90%	27	687
Birmingham	153100	2	NO	6	24.80%	226	910
Birmingham	153100	3	NO	6	39.80%	250	628
Birmingham	153200	1	NO	6	35.30%	337	954
Birmingham	153200	2	NO	6	41.70%	411	986
Birmingham	152600	1	NO	5	21.30%	340	1,596
Birmingham	152600	2	NO	5	11.20%	77	687
Birmingham	152600	3	NO	5	13.10%	112	853
Birmingham	152600	4	NO	5	19.90%	109	547



**NSP AREAS OF GREATEST NEED – CITY OF CLAWSON**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Clawson	180200	1	YES	7	55.90%	327	585
Clawson	180200	2	YES	7	66.90%	593	887
Clawson	180200	3	YES	7	61.60%	818	1,328
Clawson	180200	4	YES	7	82.50%	378	458
Clawson	180200	5	YES	7	68.10%	343	504
Clawson	180300	1	YES	6	63.70%	960	1,506
Clawson	180300	2	YES	6	77.30%	430	556
Clawson	180300	3	YES	6	54.00%	498	922
Clawson	180000	1	YES	6	68.10%	924	1,356
Clawson	180000	2	YES	6	56.50%	895	1,585
Clawson	180100	1	YES	6	51.20%	555	1,085
Clawson	180100	3	YES	6	60.30%	491	814
Clawson	180100	2	NO	6	41.20%	472	1,146

**NSP AREAS OF GREATEST NEED – CITY OF FARMINGTON**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Farmington	165200	5	YES	7	58.90%	768	1,305
Farmington	165200	8	NO	7	45.40%	388	854
Farmington	165200	9	NO	7	46.00%	556	1,208
Farmington	165000	2	YES	6	52.50%	419	798
Farmington	165000	1	NO	6	41.20%	390	946
Farmington	165000	3	NO	6	48.00%	638	1,329
Farmington	165100	1	NO	5	40.70%	559	1,373
Farmington	165100	2	NO	5	23.80%	190	797
Farmington	165100	3	NO	5	50.70%	919	1,813

**NSP AREAS OF GREATEST NEED – CITY OF NOVI**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Novi	136100	1	YES	5	53.90%	1,002	1,858
Novi	136100	2	YES	5	68.40%	460	673
Novi	136100	3	YES	5	70.50%	2,424	3,440
Novi	136500	1	NO	5	40.90%	2,186	5,349
Novi	136700	1	NO	5	31.50%	1,892	6,007
Novi	136000	1	NO	4	49.00%	652	1343
Novi	136600	1	NO	5	49.00%	614	1,252
Novi	136600	4	NO	4	17.90%	406	2,274
Novi	136600	9	NO	4	45.00%	1,302	2,894
Novi	136800	1	YES	5	54.70%	1,907	3,485
Novi	137400	1	NO	4	10.00%	539	5,384
Novi	136300	2	NO	4	32.80%	1,586	4,839
Novi	137100	1	NO	4	31.20%	2,154	6,891
Novi	137700	1	NO	3	28.10%	497	1,770

**NSP AREAS OF GREATEST NEED – CITY OF ROCHESTER**

<b>AREA OF GREATEST NEED</b>	<b>CT</b>	<b>BG</b>	<b>MIDDLE INCOME ELIGIBLE</b>	<b>ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE</b>	<b>PERCENT 120 AMI</b>	<b>PERSONS 120%</b>	<b>TOTAL PERSONS</b>
Rochester	191200	1	YES	7	54.90%	412	751
Rochester	191200	3	YES	7	56.30%	922	1,639
Rochester	191200	2	NO	7	21.50%	290	1,347
Rochester	191000	1	YES	6	53.80%	465	865
Rochester	191000	2	YES	6	62.50%	507	811
Rochester	191100	1	YES	5	56.50%	977	1,729
Rochester	191100	2	NO	5	39.80%	255	640
Rochester	191300	1	NO	4	12.60%	338	2,685

**NSP AREAS OF GREATEST NEED – CITY OF ROCHESTER HILLS**

<b>AREA OF GREATEST NEED</b>	<b>CT</b>	<b>BG</b>	<b>MIDDLE INCOME ELIGIBLE</b>	<b>ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE</b>	<b>PERCENT 120 AMI</b>	<b>PERSONS 120%</b>	<b>TOTAL PERSONS</b>
Rochester Hills	194500	1	YES	8	68.70%	899	1,308
Rochester Hills	193700	2	YES	6	51.10%	788	1,542
Rochester Hills	193700	3	YES	6	69.10%	874	1,265
Rochester Hills	193700	1	NO	6	26.60%	252	949
Rochester Hills	194000	1	YES	5	57.50%	1,081	1,880
Rochester Hills	194000	2	NO	5	42.80%	1,098	2,564
Rochester Hills	194000	3	NO	5	32.70%	237	725
Rochester Hills	193600	1	YES	5	58.00%	1,326	2,287
Rochester Hills	194600	1	YES	6	57.80%	633	1,095
Rochester Hills	194600	2	NO	6	47.60%	904	1,901
Rochester Hills	194600	3	NO	6	40.50%	358	884
Rochester Hills	193500	1	YES	6	83.00%	1,862	2,244
Rochester Hills	194400	1	NO	6	35.30%	734	2,082
Rochester Hills	194400	2	NO	6	44.70%	414	927
Rochester Hills	192000	1	NO	5	30.70%	432	1,407
Rochester Hills	192000	2	NO	5	51.00%	492	965
Rochester Hills	192000	3	NO	5	47.40%	1,008	2,127
Rochester Hills	192700	1	NO	5	16.70%	218	1,303
Rochester Hills	192700	2	NO	5	20.60%	352	1,710
Rochester Hills	193300	1	YES	5	58.40%	1,103	1,888
Rochester Hills	193300	2	YES	5	57.90%	1,306	2,254
Rochester Hills	193300	3	NO	5	22.50%	174	775
Rochester Hills	194200	1	NO	4	43.20%	530	1,228
Rochester Hills	194200	2	NO	4	23.60%	136	577
Rochester Hills	193100	3	YES	3	51.90%	410	790
Rochester Hills	193100	1	NO	3	37.20%	604	1,622
Rochester Hills	193100	2	NO	3	26.70%	370	1,387
Rochester Hills	194300	1	NO	4	21.60%	416	1,923
Rochester Hills	194300	2	NO	4	23.50%	292	1,244
Rochester Hills	192200	1	NO	3	19.80%	498	2,516
Rochester Hills	192200	2	NO	3	20.50%	527	2,565
Rochester Hills	192200	3	NO	3	16.70%	225	1,348
Rochester Hills	192400	1	NO	4	10.10%	71	704
Rochester Hills	192400	2	NO	4	41.00%	430	1,048
Rochester Hills	192400	3	NO	4	28.40%	449	1,581
Rochester Hills	192400	4	NO	4	23.70%	445	1,878
Rochester Hills	194100	2	YES	3	59.80%	418	699
Rochester Hills	194100	1	NO	3	26.40%	620	2,350
Rochester Hills	193000	1	NO	4	21.60%	165	763
Rochester Hills	193000	2	NO	4	26.90%	194	721
Rochester Hills	193000	3	NO	4	38.00%	439	1,154
Rochester Hills	193000	4	NO	4	27.70%	182	658
Rochester Hills	193400	1	NO	3	27.20%	1,034	3,804
Rochester Hills	192500	1	NO	3	15.50%	317	2,042
Rochester Hills	192500	2	NO	3	3.90%	57	1,470
Rochester Hills	192800	1	NO	1	49.10%	337	686

**NSP AREAS OF GREATEST NEED – CITY OF SOUTH LYON**

<b>AREA OF GREATEST NEED</b>	<b>CT</b>	<b>BG</b>	<b>MIDDLE INCOME ELIGIBLE</b>	<b>ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE</b>	<b>PERCENT 120 AMI</b>	<b>PERSONS 120%</b>	<b>TOTAL PERSONS</b>
South Lyon	139400	1	NO	8	47.00%	1,048	2,232
South Lyon	139200	1	YES	8	61.60%	1,770	2,875
South Lyon	139200	2	YES	8	56.20%	1,674	2,978
South Lyon	139400	2	NO	8	45.10%	881	1,955
South Lyon	138100	1	NO	6	0.00%	0	0

**NSP AREAS OF GREATEST NEED – CITY OF SYLVAN LAKE**

<b>AREA OF GREATEST NEED</b>	<b>CT</b>	<b>BG</b>	<b>MIDDLE INCOME ELIGIBLE</b>	<b>ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE</b>	<b>PERCENT 120 AMI</b>	<b>PERSONS 120%</b>	<b>TOTAL PERSONS</b>
Sylvan Lake	154000	3	YES	6	54.70%	305	558
Sylvan Lake	154000	1	NO	6	30.90%	159	515
Sylvan Lake	154000	2	NO	6	29.00%	183	632

**NSP AREAS OF GREATEST NEED – CITY OF TROY**

<b>AREA OF GREATEST NEED</b>	<b>CT</b>	<b>BG</b>	<b>MIDDLE INCOME ELIGIBLE</b>	<b>ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE</b>	<b>PERCENT 120 AMI</b>	<b>PERSONS 120%</b>	<b>TOTAL PERSONS</b>
Troy	198100	1	YES	6	74.20%	1,951	2,631
Troy	197300	1	YES	6	53.80%	834	1,550
Troy	197300	2	YES	6	53.00%	1,812	3,420
Troy	197500	1	YES	6	63.50%	2,605	4,102
Troy	197400	1	YES	7	59.30%	518	874
Troy	197400	2	YES	7	79.80%	651	816
Troy	197400	3	YES	7	92.50%	298	322
Troy	197600	1	YES	6	56.50%	894	1,583
Troy	196900	1	NO	5	25.90%	568	2,193
Troy	196900	2	NO	5	33.50%	478	1,427
Troy	198000	1	NO	5	32.90%	309	938
Troy	198000	2	NO	5	34.80%	812	2,332
Troy	197000	1	NO	5	49.20%	967	1,964
Troy	197000	2	NO	5	28.00%	695	2,478
Troy	196700	1	NO	4	27.90%	835	2,993
Troy	196000	1	NO	4	25.50%	429	1,684
Troy	196000	2	NO	4	24.60%	1,125	4,575
Troy	197700	2	YES	5	56.10%	2,052	3,655
Troy	197700	1	NO	5	0.00%	0	0
Troy	197700	3	NO	5	35.80%	552	1,540
Troy	196500	1	NO	5	25.90%	1,492	5,750
Troy	196100	1	NO	4	47.10%	1,452	3,080
Troy	196100	2	NO	4	34.50%	925	2,684
Troy	197900	1	NO	4	25.50%	338	1,324
Troy	197900	2	NO	4	27.10%	616	2,272
Troy	196200	1	NO	5	44.90%	781	1,740
Troy	196200	2	NO	5	23.40%	448	1,911
Troy	196300	2	YES	5	52.30%	493	942
Troy	196300	1	NO	5	33.90%	939	2,771
Troy	197200	1	NO	4	26.40%	551	2,088
Troy	197200	2	NO	4	38.20%	485	1,268
Troy	197100	1	NO	5	42.40%	591	1,394
Troy	197100	2	NO	5	32.30%	379	1,173
Troy	196400	1	NO	4	24.80%	205	825
Troy	196400	2	NO	4	12.20%	411	3,361
Troy	196600	1	NO	4	10.70%	244	2,283
Troy	196800	1	NO	4	14.50%	728	5,016

**NSP AREAS OF GREATEST NEED – CITY OF WALLED LAKE**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Walled Lake	134900	2	YES	7	65.40%	591	903
Walled Lake	134900	3	YES	7	60.80%	1,177	1,936
Walled Lake	134900	1	YES	7	70.70%	555	785
Walled Lake	134500	1	YES	5	76.70%	174	227
Walled Lake	134700	1	YES	6	63.90%	1,689	2,643

**NSP AREAS OF GREATEST NEED – CITY OF WIXOM**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Wixom	133000	3	YES	5	55.70%	1,509	2,707
Wixom	133000	1	NO	5	39.50%	413	1,045
Wixom	133000	2	NO	5	45.30%	896	1,979
Wixom	133100	1	YES	5	89.40%	2,634	2,947
Wixom	133100	2	YES	5	86.20%	1,507	1,747
Wixom	133000	4	NO	5	32.70%	929	2,841

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF ADDISON**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Addison twp	120000	1	YES	8	57.50%	416	723
Addison twp	120000	2	NO	8	49.00%	1,133	2,312
Addison twp	120300	1	NO	7	35.80%	506	1,413
Addison twp	120300	2	NO	7	37.90%	631	1662

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF BRANDON**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Brandon twp	122900	1	NO	8	24.60%	103	418
Brandon twp	122700	1	YES	7	58.80%	868	1475
Brandon twp	122700	2	NO	7	39.30%	611	1556
Brandon twp	122200	2	YES	6	53.70%	796	1,481
Brandon twp	122200	1	NO	6	45.90%	813	1,771
Brandon twp	122400	3	YES	7	76.40%	2,272	2,973
Brandon twp	122400	1	NO	7	41.00%	881	2,148
Brandon twp	122400	2	NO	7	45.90%	649	1,413

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF COMMERCE**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Commerce twp	134400	2	YES	7	65.30%	488	747
Commerce twp	134400	1	NO	7	37.50%	1,064	2,834
Commerce twp	134400	3	NO	7	46.60%	549	1,178
Commerce twp	134000	1	YES	7	53.60%	555	1,036
Commerce twp	134000	2	YES	7	59.40%	434	731
Commerce twp	134000	3	NO	7	44.90%	394	878
Commerce twp	134000	4	NO	7	47.30%	654	1,384
Commerce twp	134300	1	YES	6	60.60%	881	1,453
Commerce twp	134300	2	YES	6	56.50%	1,006	1,779
Commerce twp	134300	3	NO	6	38.10%	564	1,482
Commerce twp	134200	3	YES	7	73.00%	1,927	2,639
Commerce twp	134800	1	NO	5	44.30%	1,002	2,260
Commerce twp	134200	1	NO	7	35.70%	697	1,951
Commerce twp	134200	2	NO	7	44.20%	584	1,321
Commerce twp	134500	1	NO	5	33.40%	952	2,848
Commerce twp	134100	9	NO	5	20.80%	1,243	5,985

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF GROVELAND**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Groveland twp	123000	1	YES	8	59.90%	917	1,530
Groveland twp	123000	2	YES	8	59.90%	888	1482
Groveland twp	123100	1	NO	6	20.70%	306	1,481
Groveland twp	123100	2	NO	6	36.60%	607	1657

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF HIGHLAND**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Highland twp	131600	1	NO	7	19.40%	91	469
Highland twp	131600	2	NO	7	48.10%	986	2,050
Highland twp	131100	1	NO	7	48.00%	1,101	2,296
Highland twp	131500	3	YES	7	61.20%	535	874
Highland twp	131500	1	NO	7	47.50%	462	973
Highland twp	131500	2	NO	7	45.60%	993	2,179
Highland twp	131400	1	YES	7	53.60%	1,023	1,909
Highland twp	131400	2	NO	7	46.00%	64	139
Highland twp	131800	2	YES	8	84.10%	2,303	2,738
Highland twp	131800	3	YES	8	80.90%	919	1,136
Highland twp	131800	1	NO	8	25.80%	226	875
Highland twp	131300	3	YES	6	61.30%	600	978
Highland twp	131300	1	NO	6	42.10%	751	1,784
Highland twp	131300	2	NO	6	45.80%	362	791

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF INDEPENDENCE**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Independence twp	127400	2	YES	8	56.50%	621	1,100
Independence twp	127400	1	NO	8	50.60%	379	749
Independence twp	127700	3	YES	7	69.70%	1,823	2,616
Independence twp	127700	1	NO	7	49.80%	773	1,553
Independence twp	127700	2	NO	7	40.30%	801	1,987
Independence twp	127500	1	NO	6	37.20%	516	1,388
Independence twp	127500	2	NO	6	34.80%	519	1,490
Independence twp	127500	3	NO	6	38.90%	1,265	3,250
Independence twp	127300	1	NO	7	44.70%	430	962
Independence twp	127300	2	NO	7	45.40%	998	2,196
Independence twp	127300	3	NO	7	41.20%	401	974
Independence twp	127600	1	NO	5	27.10%	726	2,680
Independence twp	127000	1	NO	5	41.60%	730	1,754
Independence twp	127000	2	NO	5	30.80%	571	1,851
Independence twp	127000	3	NO	5	40.00%	620	1,551
Independence twp	127200	2	YES	6	82.10%	46	56
Independence twp	127200	1	NO	6	24.00%	252	1,049
Independence twp	127100	1	NO	5	29.30%	315	1,074
Independence twp	127100	2	NO	5	18.50%	237	1279
Independence twp	127100	3	NO	5	30.60%	915	2,984

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF LYON**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Lyon twp	139400	2	NO	8	0.00%	0	0
Lyon twp	139200	1	NO	8	47.30%	53	112
Lyon twp	139200	2	NO	8	0.00%	0	0
Lyon twp	139400	1	YES	8	100.00%	6	6
Lyon twp	138600	1	NO	5	43.50%	254	584
Lyon twp	138600	2	NO	5	44.80%	528	1179
Lyon twp	138300	1	NO	5	49.40%	2380	4818
Lyon twp	138300	2	NO	5	45.10%	546	1210
Lyon twp	138100	1	YES	6	61.20%	1060	1733
Lyon twp	138100	2	NO	6	29.20%	402	1,379

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF MILFORD**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Milford twp	132600	2	NO	6	38.40%	314	817
Milford twp	132600	1	NO	6	33.20%	787	2373
Milford twp	132100	2	YES	7	51.30%	1609	3,135
Milford twp	132100	1	NO	7	40.60%	1059	2609



**NSP AREAS OF GREATEST NEED – TOWNSHIP OF OAKLAND**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Oakland twp	190500	1	NO	5	30.20%	655	2,169
Oakland twp	190200	1	NO	5	27.10%	378	1392
Oakland twp	190400	2	YES	6	60.40%	689	1,140
Oakland twp	190400	1	YES	6	55.50%	697	1255
Oakland twp	190300	1	NO	4	25.90%	336	1,298
Oakland twp	190600	1	NO	5	30.10%	219	727
Oakland twp	190700	1	NO	6	26.50%	241	910
Oakland twp	190800	1	NO	4	12.40%	509	4,094

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF ORION**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Orion twp	128300	2	YES	7	67.60%	1,202	1,779
Orion twp	128300	3	YES	7	57.90%	434	750
Orion twp	128300	1	NO	7	45.80%	1,003	2,189
Orion twp	128500	2	YES	6	57.50%	619	1,076
Orion twp	128500	1	NO	6	42.70%	339	793
Orion twp	128500	3	NO	6	36.50%	516	1,413
Orion twp	128000	2	YES	7	52.50%	663	1,262
Orion twp	128000	1	NO	7	40.80%	757	1,855
Orion twp	128400	1	YES	7	53.40%	465	870
Orion twp	128400	2	YES	7	52.10%	751	1,441
Orion twp	128400	3	YES	7	89.50%	770	860
Orion twp	128100	1	NO	6	48.90%	553	1,132
Orion twp	128100	2	NO	6	44.40%	273	615
Orion twp	128100	3	NO	6	22.60%	262	1,159
Orion twp	128600	1	NO	6	25.50%	715	2,799
Orion twp	128900	1	NO	5	39.50%	588	1490
Orion twp	128900	2	NO	5	27.00%	761	2815
Orion twp	128200	1	NO	4	29.60%	258	871
Orion twp	128200	2	NO	4	23.70%	636	2,683
Orion twp	128800	1	NO	6	50.00%	609	1,218
Orion twp	128700	1	NO	4	19.30%	330	1,707

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF OXFORD**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Oxford twp	121000	2	YES	7	67.80%	1,106	1,630
Oxford twp	121000	1	NO	7	40.50%	283	699
Oxford twp	121600	1	YES	6	61.40%	1,691	2,753
Oxford twp	121600	2	NO	6	39.80%	1162	2,922
Oxford twp	121600	3	NO	6	36.70%	1,178	3,207
Oxford twp	121400	1	NO	6	49.30%	576	1168

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF SPRINGFIELD**

<b>AREA OF GREATEST NEED</b>	<b>CT</b>	<b>BG</b>	<b>MIDDLE INCOME ELIGIBLE</b>	<b>ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE</b>	<b>PERCENT 120 AMI</b>	<b>PERSONS 120%</b>	<b>TOTAL PERSONS</b>
Springfield twp	126400	1	NO	6	38.20%	500	1308
Springfield twp	126400	2	NO	6	43.30%	569	1,312
Springfield twp	126400	3	NO	6	41.30%	459	1110
Springfield twp	126500	2	YES	6	51.10%	479	937
Springfield twp	126500	1	NO	6	46.90%	865	1,842
Springfield twp	126200	1	NO	6	34.00%	537	1579
Springfield twp	126200	2	NO	6	32.70%	255	779
Springfield twp	126300	1	YES	7	67.40%	1728	2561
Springfield twp	126300	2	NO	7	35.90%	672	1867

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF WEST BLOOMFIELD**

<b>AREA OF GREATEST NEED</b>	<b>CT</b>	<b>BG</b>	<b>MIDDLE INCOME ELIGIBLE</b>	<b>ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE</b>	<b>PERCENT 120 AMI</b>	<b>PERSONS 120%</b>	<b>TOTAL PERSONS</b>
West Bloomfield twp	154200	1	NO	10	0.00%	0	0
West Bloomfield twp	157500	1	NO	9	26.70%	379	1,422
West Bloomfield twp	157500	2	NO	9	33.30%	516	1,549
West Bloomfield twp	156900	3	NO	7	30.40%	483	1,590
West Bloomfield twp	156900	4	NO	7	41.20%	668	1,620
West Bloomfield twp	157100	1	NO	7	44.30%	395	892
West Bloomfield twp	157100	5	NO	7	30.30%	360	1,187
West Bloomfield twp	157600	1	NO	7	23.30%	341	1,463
West Bloomfield twp	157600	2	NO	7	26.40%	407	1,542
West Bloomfield twp	157600	3	NO	7	37.80%	757	2,001
West Bloomfield twp	154600	1	NO	7	30.70%	472	1,538
West Bloomfield twp	154600	2	NO	7	25.80%	401	1,557
West Bloomfield twp	157400	1	NO	6	35.30%	633	1,793
West Bloomfield twp	157300	1	NO	7	37.60%	992	2,641
West Bloomfield twp	156500	1	NO	7	28.00%	1,371	4,900
West Bloomfield twp	157000	1	NO	7	30.70%	273	889
West Bloomfield twp	157000	2	NO	7	21.10%	333	1,578
West Bloomfield twp	157700	1	NO	6	23.60%	588	2,492
West Bloomfield twp	157800	1	NO	7	26.60%	779	2,927
West Bloomfield twp	154100	1	NO	6	43.60%	542	1,242
West Bloomfield twp	154100	2	NO	6	41.40%	661	1,595
West Bloomfield twp	156200	1	NO	6	45.30%	621	1,370
West Bloomfield twp	156200	2	NO	6	41.00%	419	1,021
West Bloomfield twp	156200	3	NO	6	31.40%	341	1,087
West Bloomfield twp	156200	4	NO	6	27.10%	355	1,311
West Bloomfield twp	156200	5	NO	6	30.90%	602	1,948
West Bloomfield twp	157200	1	NO	8	36.20%	404	1,116
West Bloomfield twp	157200	2	NO	8	36.30%	563	1,550
West Bloomfield twp	156000	1	YES	6	53.30%	390	732
West Bloomfield twp	157900	1	NO	6	23.50%	265	1,130
West Bloomfield twp	157900	2	NO	6	23.70%	434	1,831
West Bloomfield twp	156000	2	NO	6	14.50%	81	557
West Bloomfield twp	156000	3	NO	6	38.10%	246	645
West Bloomfield twp	156000	4	NO	6	16.00%	125	783
West Bloomfield twp	156100	1	NO	6	37.20%	834	2,243
West Bloomfield twp	156100	2	NO	6	18.40%	500	2,723
West Bloomfield twp	156400	1	NO	6	25.50%	392	1,540
West Bloomfield twp	156400	2	NO	6	23.50%	594	2,532
West Bloomfield twp	156300	1	NO	5	13.70%	140	1,025
West Bloomfield twp	156300	2	NO	5	27.90%	198	710
West Bloomfield twp	156300	3	NO	5	23.30%	589	2,532

**NSP AREAS OF GREATEST NEED – TOWNSHIP OF WHITE LAKE**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
White Lake twp	130600	3	YES	7	67.90%	489	720
White Lake twp	130600	1	NO	7	41.70%	288	691
White Lake twp	130600	2	NO	7	41.70%	807	1,937
White Lake twp	130200	1	YES	7	57.50%	982	1,708
White Lake twp	130200	2	YES	7	56.10%	1,629	2,906
White Lake twp	130200	3	NO	7	43.00%	365	848
White Lake twp	130700	2	YES	6	60.20%	1,335	2,219
White Lake twp	130700	1	NO	6	38.60%	1,096	2,836
White Lake twp	130000	9	YES	6	58.50%	1,604	2,740
White Lake twp	130500	1	NO	6	28.10%	586	2,084
White Lake twp	130500	2	NO	6	41.30%	366	887
White Lake twp	130400	1	NO	6	39.30%	1,139	2,901
White Lake twp	130100	1	NO	5	50.00%	956	1913
White Lake twp	130300	1	NO	5	0.00%	0	0
White Lake twp	130300	2	NO	5	40.70%	1,552	3,807

**NSP AREAS OF GREATEST NEED – VILLAGE OF LEONARD**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Leonard village	120000	1	YES	8	64.50%	142	220
Leonard village	120300	1	YES	7	80.90%	89	110

**NSP AREAS OF GREATEST NEED – VILLAGE OF MILFORD**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Milford village	132700	1	NO	6	45.60%	456	1,001
Milford village	132700	2	NO	6	37.90%	761	2,006
Milford village	132500	1	YES	6	52.00%	881	1,695
Milford village	132500	2	YES	6	69.40%	765	1,102
Milford village	132500	3	YES	6	54.20%	289	533

**NSP AREAS OF GREATEST NEED – VILLAGE OF OXFORD**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120%	TOTAL PERSONS
Oxford village	121500	2	YES	9	77.50%	540	697
Oxford village	121500	3	YES	9	65.30%	1,001	1,532
Oxford village	121500	1	NO	9	31.50%	447	1,417

**NSP AREAS OF GREATEST NEED – VILLAGE OF WOLVERINE LAKE**

<b>AREA OF GREATEST NEED</b>	<b>CT</b>	<b>BG</b>	<b>MIDDLE INCOME ELIGIBLE</b>	<b>ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE</b>	<b>PERCENT 120 AMI</b>	<b>PERSONS 120%</b>	<b>TOTAL PERSONS</b>
Wolverine Lk Vlg	134600	3	YES	6	59.30%	825	1,391
Wolverine Lk Vlg	134600	1	NO	6	41.60%	744	1,787
Wolverine Lk Vlg	134600	2	NO	6	48.40%	611	1,262
Wolverine Lk Vlg	134500	1	YES	5	100.00%	37	37

The following HUD User Data is provided for the top quartile communities with the highest Neighborhood Destabilization Ratios which are the areas of greatest need for the purposes of community level administered programs under NSP. This information identifies several key elements in the areas which have 51% concentrations of households earning 120% of median income or less. These block groups are eligible for NSP activities that benefit the area. In several areas of greatest need the entire community (Keego Harbor, Hazel Park, Royal Oak Township and Holly Village) is an eligible middle income area. Sixty nine percent (or 92,980 persons) of the total population within the areas of great need meet the “middle income” definition. Unless otherwise stated, HUD’s Neighborhood Stabilization Program website at [www.huduser.org](http://www.huduser.org) provided the data in the following tables.

- The column labeled “Area of Greatest Need” indicates the twelve participating communities with the highest level of Neighborhood Destabilization based upon a series of factors as described above.
- The column labeled “CT and BG” provides the Census Tract and Block Group location with the area of greatest need.
- The column labeled “Middle Income Eligible” indicates whether or not each Census Block Group qualifies as an area of low-, moderate-, and middle-income (LMMI) benefit, where more than 51 percent of the people in the area had incomes less than 120 percent of Area Median Income (AMI). (All HUD-NSP funds shall be used to benefit individuals and families whose incomes do not exceed 120 percent of area median income.)
- The column “Estimated foreclosure abandonment risk score” provides a score for each neighborhood from 0 to 10, where 0 indicates that our data suggest a very low risk and 10 suggest a very high risk.
- The column labeled “Percent 120 AMI” provides the percent of people in each Census Tract Block Group that had incomes less than 120 percent of Area Median Income.
- The column labeled “Persons 120 AMI” provides the number of people in each Census Tract Block Group that had income less than 120 percent of Area Median Income.
- The column labeled “Total Persons” indicates the total number of people in each Census Tract Block Group.

The following NSP Area of Greatest Need tables are accompanied by a brief introduction narrative and followed by maps which provide the overall level of 2008 Sheriff Deeds as of 10/20/08 and additional detail available at application time.

The City of Hazel Park has the highest Neighborhood Destabilization Ratio at 0.12236. The City has identified the area south of Nine Mile Road north to Elza Avenue and west of Dequindre to east of West End Street (CT 1752 and CT 1753) as the area of greatest need for stabilization. Within this area an average of 62.8% of the population are low to moderate income. There are approximately 100 foreclosed upon properties located within this area. The City has the highest rate of local foreclosures to single family housing units in Oakland County (21%) as well as an average subprime loans rate of 42%.

**TOP QUARTILE NSP AREAS OF GREATEST NEED – CITY OF HAZEL PARK**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Hazel Park	175000	1	YES	9	82.3%	502	610
Hazel Park	175000	2	YES	9	71.5%	557	779
Hazel Park	175000	3	YES	9	82.8%	985	1,189
Hazel Park	175000	4	YES	9	90.9%	637	701
Hazel Park	175100	1	YES	9	78.1%	842	1,078
Hazel Park	175100	2	YES	9	82.2%	851	1,035
Hazel Park	175100	3	YES	9	69.6%	530	761
Hazel Park	175100	4	YES	9	87.9%	706	803
Hazel Park	175100	5	YES	9	97.0%	716	738
Hazel Park	175100	6	YES	9	81.3%	608	748
Hazel Park	175100	7	YES	9	82.0%	492	600
Hazel Park	175200	1	YES	10	77.9%	617	792
Hazel Park	175200	2	YES	10	88.4%	804	909
Hazel Park	175200	3	YES	10	72.6%	630	868
Hazel Park	175200	4	YES	10	88.0%	485	551
Hazel Park	175200	5	YES	10	80.3%	498	620
Hazel Park	175200	6	YES	10	75.0%	402	536
Hazel Park	175300	1	YES	10	81.5%	392	481
Hazel Park	175300	2	YES	10	83.3%	577	693
Hazel Park	175300	3	YES	10	79.2%	801	1,012
Hazel Park	175300	4	YES	10	84.2%	464	551
Hazel Park	175300	5	YES	10	87.4%	953	1,090
Hazel Park	175300	6	YES	10	84.8%	867	1,022
Hazel Park	175300	7	YES	10	82.5%	657	796

The City of Oak Park is a community that has been significantly impacted by a high level of home foreclosures. The City has a Neighborhood Destabilization Ratio 0.11764. Records provided by the City Assessor indicate that over 400 homes in Oak Park are in foreclosure or in some stage of the foreclosure process. These homes are fairly evenly distributed throughout the City. The City's priority with the NSP Funds will be to target foreclosed homes on streets and in neighborhoods that are otherwise stable. The goal is to eliminate individual blighted homes from bringing down the appearance and quality of life for the other well maintained homes in the neighborhood.

**TOP QUARTILE NSP AREAS OF GREATEST NEED – CITY OF OAK PARK**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Oak Park	171000	1	YES	8	76.4%	543	711
Oak Park	171000	2	YES	8	58.1%	519	894
Oak Park	171000	3	YES	8	63.4%	569	898
Oak Park	171000	4	YES	8	81.2%	1,293	1,593
Oak Park	171000	5	NO	8	46.9%	622	1,326
Oak Park	171100	1	YES	10	65.4%	399	610
Oak Park	171100	2	YES	10	52.3%	1,132	2,163
Oak Park	171100	3	YES	10	68.7%	752	1,095
Oak Park	171200	1	YES	10	68.8%	614	892
Oak Park	171200	2	YES	10	66.0%	460	697
Oak Park	171200	3	YES	10	60.9%	546	897
Oak Park	171300	1	YES	10	70.6%	970	1,373
Oak Park	171300	2	YES	10	61.5%	1,234	2,006
Oak Park	171400	1	YES	10	72.9%	921	1,263
Oak Park	171400	2	YES	10	77.0%	1,477	1,918
Oak Park	171400	3	YES	10	62.0%	744	1,200
Oak Park	171400	4	YES	10	68.5%	778	1,135
Oak Park	171400	5	YES	10	76.2%	942	1,236
Oak Park	171500	1	YES	10	69.0%	1,348	1,953
Oak Park	171500	2	YES	10	67.7%	2,280	3,367
Oak Park	171600	1	YES	10	87.7%	2,251	2,566
Oak Park	172400	1	YES	10	90.9%	2,370	2,606

Royal Oak Township has an estimated foreclosure rate of 13.38% with 36 foreclosures located in CT 1725. The Neighborhood Destabilization Ratio for Royal Oak Township is 0.09431. The community also has a high cost loan rate of nearly 60%. With 85 vacancies, the township's estimated 90-Day Vacancy Rate is 7.61%. While the whole township has been affected by the foreclosure crisis the target area for NSP is Census Tract 1725 BG 1.

**TOP QUARTILE NSP AREAS OF GREATEST NEED – ROYAL OAK TOWNSHIP**

AREA OF GREATEST NEED	CT	B G	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Royal Oak Twp	172500	1	YES	10	88.0%	1,497	1,702
Royal Oak Twp	172500	2	YES	10	80.1%	911	1,138



The City of Madison Heights has a Neighborhood Destabilization Ratio of 0.07694. The City mapped the location of homes foreclosed upon in 2006, 2007 and 2008, after the redemption period, that were on file with the City to determine the areas of greatest need. The locations of vacant homes that the City's Code Enforcement Division was monitoring in 2008 were mapped. Code enforcement and the Building Official inspected these properties to verify current building condition and occupancy status. Finally, the Building Official identified vacant non-foreclosed blighted properties. This process identified those areas with the highest concentration of foreclosed and/or vacant homes and blighted structures. In addition, Census Tracts were analyzed for High Cost Loan Rates, Predicted 18 month Underlying Problem Foreclosure Rates and the USPS Residential Vacancy Rates. Following this methodology the identified NSP target areas with the greatest need are Census Tracts 1813, 1814, 1815 and 1816. These Tracts all meet the NSP <120% AMI standard with the exception of Census Tract 1813 Block Group 4 which meets the <50% AMI standard.

**TOP QUARTILE NSP AREAS OF GREATEST NEED – CITY OF MADISON HEIGHTS**

AREA OF GREATEST NEED	CT	B G	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Madison Heights	181000	1	YES	6	76.5%	1,498	1,959
Madison Heights	181000	2	YES	6	74.7%	1,490	1,994
Madison Heights	181100	1	NO	7	38.2%	332	870
Madison Heights	181100	2	YES	7	69.5%	367	528
Madison Heights	181100	3	YES	7	59.9%	367	613
Madison Heights	181100	4	YES	7	57.2%	521	911
Madison Heights	181200	1	YES	8	69.4%	1,817	2,618
Madison Heights	181200	2	YES	8	64.0%	1,215	1,897
Madison Heights	181200	3	YES	8	56.2%	492	876
Madison Heights	181200	4	YES	8	65.8%	905	1,376
Madison Heights	181300	1	YES	8	75.1%	1,277	1,701
Madison Heights	181300	2	YES	8	82.7%	1,325	1,602
Madison Heights	181300	3	YES	8	70.9%	882	1,244
Madison Heights	181300	4	YES	8	64.0%	894	1,396
Madison Heights	181400	1	YES	8	68.1%	507	745
Madison Heights	181400	2	YES	8	61.3%	330	538
Madison Heights	181400	3	YES	8	77.1%	799	1,036
Madison Heights	181400	4	YES	8	75.6%	575	761
Madison Heights	181500	1	YES	9	79.1%	930	1,175
Madison Heights	181500	2	YES	9	67.4%	1,076	1,596
Madison Heights	181600	1	YES	9	73.9%	1,873	2,536
Madison Heights	181600	2	YES	9	75.7%	1,880	2,482
Madison Heights	181600	3	YES	9	82.2%	532	647

The City of Ferndale consists of 3.84 square miles located immediately north and bordering on the City of Detroit. Of the 22,105 people living in Ferndale, 14,736 people are at or below 120% of the Area Median Income. This means that an average of 66% of the City's population may be living in housing that they cannot afford or maintain. The City's Neighborhood Destabilization Ratio is 0.07505. All but two of the City's Census Block Groups qualify for NSP area-wide benefit. The areas of greatest need are on the City's eastern and southern borders. Ferndale currently has over 420 foreclosed residential properties. This amounts to approximately 4.6% of the 9200 residences in the City. Research indicates that the City has an average subprime rate of 25%, leading to many more at-risk loans and homes. Due to this, the likelihood of a major rise in foreclosures is significant, especially in the targeted NSP Census Block Groups. Most of these areas have current foreclosure percentages higher than the City's 4.6% average, one as high as 7.9%.

### TOP QUARTILE NSP AREAS OF GREATEST NEED – CITY OF FERNDALE

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Ferndale	173000	1	YES	10	67.9%	629	926
Ferndale	173000	2	YES	10	72.2%	789	1,093
Ferndale	173000	3	YES	10	76.4%	551	721
Ferndale	173000	4	YES	10	79.0%	365	462
Ferndale	173000	5	YES	10	81.1%	1,126	1,388
Ferndale	173000	6	YES	10	88.5%	479	541
Ferndale	173100	1	YES	9	69.4%	388	559
Ferndale	173100	2	YES	9	68.3%	443	649
Ferndale	173100	3	YES	9	82.2%	548	667
Ferndale	173200	1	YES	7	65.2%	673	1,033
Ferndale	173200	2	NO	7	31.7%	262	827
Ferndale	173200	3	NO	7	45.7%	479	1,049
Ferndale	173300	1	YES	9	65.1%	646	992
Ferndale	173300	2	YES	9	65.4%	490	749
Ferndale	173400	1	YES	8	79.7%	420	527
Ferndale	173400	2	YES	8	68.5%	481	702
Ferndale	173400	3	YES	8	57.2%	871	1,524
Ferndale	173400	4	YES	8	69.9%	521	745
Ferndale	173400	5	YES	8	72.6%	1,541	2,124
Ferndale	173500	1	YES	9	75.9%	779	1,027
Ferndale	173500	2	YES	9	77.0%	1,814	2,357
Ferndale	173600	1	YES	10	81.9%	1,182	1,443

The City of Keego Harbor is comprised of .6 square miles and is divided north to south by Orchard Lake Road and West and East by Cass Lake Road. Keego Harbor's Neighborhood Destabilization Ratio is 0.05574. Foreclosures cover the entire .6 square miles. The majority of housing stock was constructed on small lots as summer homes. A typical lot size is 40' x 100'. The entire city is NSP areawide eligible and contains one Census Tract and three Block Groups. Approximately 10% of all residential properties in the city are in some stage of foreclosure.

**TOP QUARTILE NSP AREAS OF GREATEST NEED – CITY OF KEEGO HARBOR**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Keego Harbor	154200	1	YES	10	60.6%	661	1,091
Keego Harbor	154200	2	YES	10	72.8%	481	661
Keego Harbor	154200	3	YES	10	84.7%	861	1,017

**Holly Village** has identified a recently built single family home development located in Census Tract 1245 Block Group 4. A windshield survey of this neighborhood indicates that this area has a large number of abandoned or foreclosed move-in ready single family homes. The Village of Holly Neighborhood Destabilization Ratio is 0.05472

**TOP QUARTILE NSP AREAS OF GREATEST NEED -HOLLY VILLAGE**

AREA OF GREATEST NEED	CT	B G	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Holly Vlg	124500	4	YES	9	77.3%	1,495	1,933
Holly Vlg	124500	5	YES	9	62.0%	1,298	2,092
Holly Vlg	124500	6	YES	9	67.4%	755	1,120
Holly Vlg	124500	7	YES	9	76.7%	759	990

**Ortonville Village** intends to focus its efforts in the northwest section of the Village between South Ortonville Road and Church Street, the south side of Mill Street, and south side of Ball Streets where the overall appeal and marketability of Village properties has been impacted the greatest by the number of vacant foreclosed homes and residences in blighted condition. County level data was mapped and a windshield survey of the entire Village was conducted along with individual exterior inspections of all foreclosed homes in the determination process. More than half but less than 51% of village residents have incomes that do not exceed 120% AMI. The Village has a Neighborhood Destabilization Ratio of 0.05148, and an estimated foreclosure abandonment risk score of 8. Based upon this information the Village of Ortonville is considered to be a top quartile NSP area of greatest need.

**TOP QUARTILE NSP AREAS OF GREATEST NEED – ORTONVILLE VILLAGE**

<b>AREA OF GREATEST NEED</b>	<b>CT</b>	<b>BG</b>	<b>MIDDLE INCOME ELIGIBLE</b>	<b>ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE</b>	<b>PERCENT 120 AMI</b>	<b>PERSONS 120 AMI</b>	<b>TOTAL PERSONS</b>
Ortonville	122900	1	NO	8	50.90%	779	1,529

**Rose Township** will target NSP funds to both areawide eligible benefit locations and the specific target areas of Holly Shore subdivision and Webberdale Road. These lower income areas have higher than average foreclosure rates. Rose Township has a Neighborhood Destabilization Ratio of 0.04995.

**TOP QUARTILE NSP AREAS OF GREATEST NEED – ROSE TOWNSHIP**

AREA OF GREATEST NEED	CT	B G	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Rose Twp	125000	1	NO	7	43.7%	510	1,168
Rose Twp	125000	2	YES	7	60.8%	1,345	2,210
Rose Twp	125600	1	YES	8	62.7%	931	1,484
Rose Twp	125600	2	NO	8	33.8%	456	1,348

Holly Township has identified a recently built single family home development located in Census Tract 1240 Block Group 3 has the area of greatest need. This area contains the highest concentration of foreclosures. The Neighborhood Destabilization Ratio of Holly Township is 0.04035.

**TOP QUARTILE NSP AREAS OF GREATEST NEED – HOLLY TOWNSHIP**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Holly Twp	124000	1	NO	8	44.0%	722	1640
Holly Twp	124000	2	NO	8	47.7%	419	878
Holly Twp	124000	3	YES	8	51.5%	713	1,384

The City of Lathrup Village has experienced over 200 foreclosures in the past five years. Foreclosure statistics from 2007 and 2008 indicate that 12% of the City's housing stock has been foreclosed upon or abandoned. Although the city does not have any NSP area wide benefit areas plummeting property values and sub-prime mortgages have greatly contributed to the local foreclosure crisis. The City has a Neighborhood Destabilization Ratio of 0.04026 and an estimated foreclosure abandonment risk score of 8 and is considered to be a top quartile NSP area of greatest need.

**TOP QUARTILE NSP AREAS OF GREATEST NEED – CITY OF LATHRUP VILLAGE**

AREA OF GREATEST NEED	CT	BG	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Lathrup Village	160000	1	NO	8	38.5%	273	709
Lathrup Village	160000	2	NO	8	24.7%	241	974
Lathrup Village	160000	3	NO	8	33.8%	256	758
Lathrup Village	160000	4	NO	8	35.7%	219	614
Lathrup Village	160000	5	NO	8	19.2%	114	594
Lathrup Village	160000	6	NO	8	30.3%	178	587



Lake Orion Village will concentrate its' NSP allocation in Census Tract 1290 Block Groups 1 and 2 which are eligible for on an areawide basis. This area is located east of M24 in the areas of the Village with the greatest concentration of residential units. The Village has a Neighborhood Destabilization Ratio of 0.04021.

**TOP QUARTILE NSP AREAS OF GREATEST NEED -LAKE ORION VILLAGE**

AREA OF GREATEST NEED	CT	B G	MIDDLE INCOME ELIGIBLE	ESTIMATED FORECLOSURE ABANDONMENT RISK SCORE	PERCENT 120 AMI	PERSONS 120 AMI	TOTAL PERSONS
Lake Orion Vlg	129000	1	YES	8	62.0%	429	692
Lake Orion Vlg	129000	2	YES	8	55.5%	393	708
Lake Orion Vlg	129000	3	NO	8	44.1%	586	1,329

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

**Response:** As an entitlement county, Oakland County distributes funds to participating communities through a formula grant application process. The County's strategy for budget allocations follows current County CDBG allocation methodology within parameters of NSP and allocates NSP as follows:

- 10% Administration funds to Oakland County
- 3.7% Housing Counseling funds to Oakland County
- 1/3 of funds to areas of greatest need for county administered homebuyer assistance program
- 2/3 of funds to areas of greatest need for local administered programs in top quartile communities with highest neighborhood destabilization ratios.

**Proposed Neighborhood Stabilization Program (NSP) Revenues**

Program Area	Revenue
County Administration (10%)	\$1,738,377
Housing Counseling (3.7%)	\$650,000
Areas of Greatest Need – county administered homebuyer assistance program (1/3)	\$4,998,467
Areas of Greatest Need – highest quartile community allocations (2/3)	\$9,996,932
<b>Total</b>	<b>\$17,383,776</b>

Allocations to community administered programs are based on funding the top quartile of communities having the highest "Neighborhood Destabilization Ratios".

**Proposed Neighborhood Stabilization Program (NSP) Allocations**

Program Area	Neighborhood Destabilization Ratio	Allocation
Hazel Park	0.12236	\$1,658,863.41
Oak Park	0.11764	\$1,630,859.79
Royal Oak Twp	0.09431	\$937,101.49
Madison Heights	0.07694	\$1,163,078.12
Ferndale	0.07505	\$1,115,160.44
Keego Harbor	0.05574	\$586,172.27
Village of Holly	0.05472	\$612,593.07
Village of Ortonville	0.05148	\$491,932.92
Rose Twp	0.04995	\$524,763.07
Holly Twp	0.04035	\$427,731.05
Lathrup Village	0.04026	\$424,379.31
Village of Lake Orion	0.04021	\$424,297.07
Areas of greatest need - community administered NSP programs (2/3) in targeted areas		\$9,996,932.00
Areas of greatest need - county administered NSP programs (1/3) in targeted areas		\$4,998,467.00
County administration (10%)		\$1,738,377.00
Public services - housing counseling (3.7%)		\$650,000.00
<b>Total Budget</b>		<b>\$17,383,776.00</b>

**Distribution and Uses of NSP Funds**

<b>NSP Eligible Use</b>	<b>Activity Funds</b>
Financing Mechanisms	\$6,078,951.56
Acq Rehab Resale	\$4,948,495.65
Land Banks	\$0
Demolition	\$849,397.35
Redevelopment	3,118,554.44
Public Services Housing Counseling	\$650,000.00
Administration	\$1,738,377.00
<b>Total</b>	<b>\$17,383,776.00</b>

**Pre-Award Costs** - This NSP Substantial Amendment contemplates 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. These pre-award costs will be used for general planning and administration. All other activities will commence on or after the date of the grant agreement. These pre-award costs are not anticipated to have any effect on future grants.

C. DEFINITIONS AND DESCRIPTIONS

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

**Response:** The U. S. Department of Housing and Urban Development (HUD) Neighborhood Stabilization Program (NSP) regulations prohibit use of program funding for the “demolition of structures that are not blighted.” NSP regulations define a “blighted structure” as one that “exhibits objectively determinable signs of deterioration sufficient to constitute a threat to human health, safety, and public welfare.”

In order to arrest and reverse economic decline and neighborhood disinvestment, and to foster and promote neighborhoods in viable, standard condition, Oakland County’s Neighborhood Stabilization Program must plan for and include the elimination of blighted structures. The challenge in defining “blighted structure” in the context of state or local law is that 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. In the context of state law the State of Michigan defines “blighted” (Public Act 381 of 1996, MCL 125.2562(e)) as a property that meets any of the following criteria:

1. Has been declared a public nuisance in accordance with a local housing, building, plumbing, fire, or other related code or ordinance;
2. Is an attractive nuisance to children because of physical condition, use, or occupancy;
3. Is a fire hazard or is otherwise dangerous to the safety of persons or property; or
4. Has had the utilities, plumbing, heating, or sewerage permanently disconnected, destroyed, removed, or rendered ineffective so that the property is unfit for its intended use.

Each local unit of government maintains their own definition of “blighted structure” and will be responsible for inspecting NSP properties and verifying the 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.

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

**Response:** Oakland County will utilize the Detroit Metropolitan Area Fair Market Rent Schedule and HOME Program Rent Schedules as published by the U. S. Department of Housing and Urban Development (HUD) at 24 CFR 92.252 (a), (c), and (f). As a current example, the 2008 HOME Program Rents for the Detroit-Warren-Livonia, MI HUD Metro FMR Area (DET-FMR\_ are listed in the table below. The DET-FMR is a gross rent figure that includes utilities. Any utilities that are required to be paid by the tenant must be subtracted from the FMR to determine the maximum “affordable rent” rate.

**2008 HOME Program Rents**

Detroit-Warren-Livonia, MI HUD Metro FMR Area							
Program	Efficiency	1 Bdr	2 Bdr	3 Bdr	4 Bdr	5 Bdr	6 Bdr
Low HOME Rent Limit	591	655	786	908	993	1118	1223
High HOME Rent Limit	591	673	805	963	993	1142	1291
Fair Market rent	591	673	805	963	993	1142	1291
50% Rent Limit	611	655	786	908	1013	1118	1223
65% Rent Limit	775	832	1001	1148	1260	1372	1485

**“Affordable Rent”** shall be defined as:

- For assisted households with income at or below 120% of the area median income—the Detroit Metropolitan Area Fair Market Rent (**DET-FMR**).
- For households receiving assistance under NSP activities targeting individuals and families with income at or below 50% of the area median income—the **Low HOME Rent**, defined as the rent affordable at 50% AMI or DET-FMR, whichever is less.

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

**Response:** Oakland County will minimally adopt the HOME program’s standards for ensuring continued affordability as defined at 24 CFR 92.252 (e) (Renter) and CFR 92.254 (Homeownership).

**Periods of Affordability (renter)** - The NSP-assisted units must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion. The affordability requirements apply without regard to the term of any loan or mortgage or the transfer of ownership. They must be imposed by deed restrictions, covenants running with the land, or other mechanisms approved by HUD, except that the affordability restrictions may terminate upon foreclosure or transfer in lieu of foreclosure. The participating jurisdiction may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure or deed in lieu of foreclosure to preserve affordability. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the foreclosure, or deed in lieu of foreclosure, or any entity that includes the former owner or those with whom the former owner has or had family or business ties, obtains an ownership interest in the project or property.

**RENTER AFFORDABILITY PERIODS**

<b>Rental Housing Activity</b>	<b>Minimum Affordability Period</b>
Rehabilitation or acquisition of existing housing per unit amount of NSP investment: under \$15,000	5 years
\$15,000 to \$40,000 per unit NSP investment	10 years
Over \$40,000 per unit NSP investment or rehabilitation involving refinancing	15 years
New construction or acquisition of newly constructed housing	20 years

**Subsequent rents during the affordability period -**

- The maximum HOME rent limits are recalculated on a periodic basis after HUD determines fair market rents and median incomes. HUD then provides the new maximum HOME rent limits to participating jurisdictions. Regardless of changes in fair market rents and in median income over time, the HOME rents for a project are not required to be lower than the HOME rent limits for the project in effect at the time of project commitment.
- Oakland County must provide project owners with information on updated HOME rent limits so that rents may be adjusted (not to exceed the maximum HOME rent limits in paragraph (f)(1) of this section) in accordance with the written agreement between the participating jurisdiction and the owner. Owners must annually provide the participating jurisdiction with information on rents and occupancy of HOME-assisted units to demonstrate compliance with this section
- Any increase in rents for HOME-assisted units is subject to the provisions of outstanding leases, and in any event, the owner must provide tenants of those units not less than 30 days prior written notice before implementing any increase in rents.

**Adjustment of HOME rent limits for a particular project -**

- Changes in fair market rents and in median income over time should be sufficient to maintain the financial viability of a project within the HOME rent limits in this section.
- HUD may adjust the HOME rent limits for a project, only if HUD finds that an adjustment is necessary to support the continued financial viability of the project and only by an amount that HUD determines is necessary to maintain continued financial viability of the project. HUD expects that this authority will be used sparingly.

**Tenant income** - The income of each tenant must be determined initially in accordance with § 92.203(a)(1)(i). In addition, each year during the period of affordability the project owner must re-examine each tenant’s annual income in accordance with one of the options in § 92.203 selected by the participating jurisdiction. An owner of a multifamily project with an affordability period of 10 years or more who re-examines tenant’s annual income through a statement and certification in accordance with § 92.203(a)(1)(ii), must examine the income of each tenant, in accordance with § 92.203(a)(1)(i), every sixth year of the affordability period. Otherwise, an owner who accepts the tenant’s statement and certification in accordance with § 92.203(a)(1)(ii) is not required to examine the income of tenants in multifamily or single-family projects unless there is evidence that the tenant’s written statement failed to completely and accurately state information about the family’s size or income.

**Over-income tenants –**

- HOME-assisted units continue to qualify as affordable housing despite a temporary noncompliance caused by increases in the incomes of existing tenants if actions satisfactory to HUD are being taken to ensure that all vacancies are filled in accordance with this section until the noncompliance is corrected.
- Tenants who no longer qualify as low-income families must pay as rent the lesser of the amount payable by the tenant under State or local law or 30 percent of the family’s adjusted income, except that tenants of HOME-assisted units that have been allocated low-income housing tax credits by a housing credit agency pursuant to section 42 of the Internal Revenue Code of 1986 (26 U.S.C. 42) must pay rent governed by section 42. In addition, in projects in which the HOME units are designated as floating pursuant to paragraph (j), tenants who no longer qualify as low-income are not required to pay as rent an amount that exceeds the market rent for comparable, unassisted units in the neighborhood.

**Fixed and floating NSP units** - In a project containing NSP-assisted and other units, Oakland County may designate fixed or floating NSP units. This designation must be made at the time of project commitment. Fixed units remain the same throughout the period of affordability. Floating units are changed to maintain conformity with the requirements of this section during the period of affordability so that the total number of housing units meeting the requirements of this section remains the same, and each substituted unit is comparable in terms of size, features, and number of bedrooms to the originally designated NSP-assisted unit.

**Periods of Affordability (homeownership)** -For NSP-assisted homeownership units; the County will impose minimum affordability periods and resale/recapture provisions. These will also be consistent with the requirements of the HOME program. The NSP-assisted housing must meet the affordability requirements for not less than the applicable period specified in the following table, beginning 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

**Resale and recapture** - To ensure affordability, Oakland County must impose either resale or recapture requirements. The resale or recapture requirements comply with 24 CFR Part 92.254 5 (i) (ii) standards and have been set forth in the County's current approved consolidated plan.

**Resale** - Resale requirements must ensure, if the housing does not continue to be the principal residence of the family for the duration of the period of affordability that the housing is made available for subsequent purchase only to a buyer whose family qualifies as a low-income family and will use the property as its principal residence. The resale requirement must also ensure that the price at resale provides the original NSP-assisted owner a fair return on investment (including the homeowner's investment and any capital improvement) and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. The period of affordability is based on the total amount of NSP funds invested in the housing.

- Except as provided in paragraph 24 CFR Part 92.254 (a) (5) (i) (B), deed restrictions, covenants running with the land, or other similar mechanisms must be used as the mechanism to impose the resale requirements. The affordability restrictions may terminate upon occurrence of any of the following termination events: foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD. Oakland County may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure to preserve affordability. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the termination event, obtains an ownership interest in the housing.
- Certain housing may be presumed to meet the resale restrictions (i.e., the housing will be available and affordable to a reasonable range of low-income homebuyers; a low-income homebuyer will occupy the housing as the family's principal residence; and the original owner will be afforded a fair return on investment) during the period of affordability without the imposition of enforcement mechanisms by the participating jurisdiction. The presumption must be based upon a market analysis of the neighborhood in which the housing is located. The market analysis must include an evaluation of the location and characteristics of the housing and residents in the neighborhood (e.g., sale prices, age and amenities of the housing stock, incomes of residents, percentage of owner-occupants) in relation to housing and incomes in the housing market area. An analysis of the current and projected incomes of neighborhood residents for an average period of affordability for homebuyers in the neighborhood must support the conclusion that a reasonable range of low-income families will continue to qualify for mortgage financing.
- For example, an analysis shows that the housing is modestly priced within the housing market area and that families with incomes of 65% to 80% of area median can afford monthly payments under average FHA terms without other government assistance and housing will remain affordable at least during the next five to seven years compared to other housing in the market area; the size and amenities of the housing are modest and substantial rehabilitation will not significantly increase the market value; the neighborhood has housing that is not currently owned by the occupants, but the participating jurisdiction is encouraging homeownership in the neighborhood by providing homeownership assistance and by making improvements to the streets, sidewalks, and other public facilities and services. If Oakland County in preparing a neighborhood revitalization strategy under § 91.215(e)(2) of its consolidated plan or Empowerment Zone or Enterprise Community application under 24 CFR part 597 has incorporated the type of market data described above, that submission may serve as the required analysis under this section. If Oakland County continues to provide homeownership assistance for housing in the neighborhood, it must periodically update the market analysis to verify the original presumption of continued affordability.

**Recapture** - Recapture provisions must ensure that Oakland County recoups all or a portion of the NSP assistance to the homebuyers, if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. Oakland County will structure its recapture provisions based on program design and market conditions. The period of affordability is based upon the total amount of NSP funds subject to recapture described in paragraph (a)(5)(ii)(A)(5) of this section. The following options for recapture requirements are acceptable to HUD. Oakland County may adopt, modify or develop its own recapture requirements for HUD approval. 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 NSP 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 NSP funds) and any closing costs.

- **Recapture entire amount** – *Oakland County* may recapture the entire amount of the NSP investment from the homeowner.
- **Reduction during affordability period** – *Oakland County* may reduce the NSP investment amount to be recaptured on a prorata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period.
- **Shared net proceeds** - If the net proceeds are not sufficient to recapture the full NSP investment (or a reduced amount as provided in 24 CFR Part 92.254 (a) (5) (ii) (A) (2)) plus enable the homeowner to recover the amount of the homeowner’s downpayment and any capital improvement investment made by the owner since purchase, Oakland County may share the net proceeds. The net proceeds are the sales price minus loan repayment (other than NSP funds) and closing costs. The net proceeds may be divided proportionally as set forth in the following mathematical formulas:

<b>NSP Investment/NSP Investment + homeowner investment</b>	<b>× Net Proceeds =</b>	<b>NSP amount to be recaptured</b>
<b>Homeowner Investment/HOME Investment + homeowner investment</b>	<b>× Net Proceeds =</b>	<b>amount to homeowner</b>

- **Owner investment returned first** - Oakland County may permit the homebuyer to recover the homebuyer’s entire investment (downpayment and capital improvements made by the owner since purchase) before recapturing the HOME investment.
- **Amount subject to recapture** - The NSP investment that is subject to recapture is based on the amount of NSP assistance that enabled the homebuyer to buy the dwelling unit. This includes any NSP 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., the development subsidy). The recaptured funds must be used to carry out NSP-eligible activities. If the NSP assistance is only used for the development subsidy and therefore not subject to recapture, the resale option must be used.
- **Lease-purchase** - NSP funds may be used to assist homebuyers through lease-purchase programs for existing housing and for housing to be constructed. The housing must be purchased by a homebuyer within 36 months of signing the lease-purchase agreement. The homebuyer must qualify as a low-income family at the time the lease-purchase agreement is signed. If NSP funds are used to acquire housing that will be resold to a homebuyer through a lease-purchase program, the NSP affordability requirements for rental housing in § 92.252 shall apply if the housing is not transferred to a homebuyer within forty-two months after project completion.
- **Contract to purchase** - If NSP funds are used to assist a homebuyer who has entered into a contract to purchase housing to be constructed, the homebuyer must qualify as a low-income family at the time the contract is signed.



***Preserving affordability*** - 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), Oakland County may use additional NSP funds to acquire the housing through a purchase option, right of first refusal, or other preemptive right before foreclosure, or to acquire the housing at the foreclosure sale, to undertake any necessary rehabilitation, and to provide assistance to another homebuyer. The housing must be sold to a new eligible homebuyer in accordance with the requirements of § 92.254(a). Additional NSP funds may not be used if the mortgage in default was funded with NSP funds.

- The total amount of original and additional NSP assistance may not exceed the maximum per-unit subsidy amount established under § 92.250. Alternatively to charging the cost to the NSP program under § 92.206, Oakland County may charge the cost to the NSP program under § 92.207, as a reasonable administrative cost of its NSP program, so that the additional NSP funds for the housing are not subject to the maximum per-unit subsidy amount.

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

**Response:** Oakland County will require at a minimum that all NSP funded activities be completed in compliance with Michigan Residential Code. Upon completion the NSP assisted housing unit will meet Certificate of Occupancy (C of O) requirements, Lead Paint Hazard Reduction requirements (HUD 24 CFR Part 35 and Michigan Public Act 368 of 1978, as amended, and all environmental review record mitigation issues have been addressed.

### ***Optional Standards***

- Energy Efficiency or Conservation measures, as shall be guided by a Home Energy Rating Standards (HERS) audit. [Note: whenever possible/practical, all required or optional improvements shall be implemented in a manner that will promote increased energy efficiency.]
- Exterior improvements (siding, trim, landscaping, etc.) to address aged or “eyesore” conditions and designed to enhance the desirability and property values of the surrounding neighborhood.
- Replacement of aging household equipment, fixtures or structural components, such as roof, windows, doors, furnace, central air, water heater, stove, refrigerator, washer, dryer, electrical or plumbing service, flooring and cabinets and any other energy efficiency improvements.
- Barrier-Free Access or Visibility Improvements when requested by an identified eligible homebuyer or in 20% of the assisted-units in a multi-unit structure with more than four units.
- Changes to the dwelling unit floor plan to more closely accommodate modern use patterns (such as, sufficient closet space, master bedroom, first floor bathroom, kitchen open to family living areas).
- Window treatments (limited to shades and blinds) to provide privacy or enhance energy efficiency.

**D. LOW INCOME TARGETING** –Identify the estimated amount of funds appropriated or otherwise made available under the NSP to be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income: \$4,345,944 (25%). *Note:* At least 25% of funds must be used for housing individuals and families whose incomes do not exceed 50 percent of area median income.

**Response:** Oakland County and the areas of greatest need will use at least 25% of NSP funds received to purchase and rehabilitate vacant and foreclosed properties for housing that serves persons at or below 50% of the area median income. It is anticipated that at least \$4,345,944 will be used for this purpose. This targeted assistance may be provided as rental housing, lease-to-purchase, homebuyer assistance or rehabilitation assistance. If the targeted assistance is offered to low-income homebuyers, closing cost and down payment assistance may also be included in the assistance package. The Oakland County Taskforce on Homelessness and Affordable Housing (the continuum of care agency for our area), 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.

**E. ACQUISITION & RELOCATION-** Indicate whether grantee intends to demolish or convert any low- and moderate-income dwelling units (i.e., = 80% of area median income). If so, include:

- 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.
- 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).
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.

**Response:** For the purposes of this Neighborhood Stabilization Program, the County and its participating communities will ensure compliance with anti-displacement through the purchase of abandoned or foreclosed properties that are vacant. The acquisition of foreclosed upon homes or residential property under this NSP plan shall be at a discount from the current-market appraised value of the property. The maximum reasonable purchase discount will be negotiated taking into consideration the likely “carrying cost” savings to the seller and the current condition of the property. The minimum purchase discount for any NSP-assisted acquisition shall be 5%. The average purchase discount for all NSP-assisted acquisitions shall be not less than 15%.

1. It is expected that after a thorough inspection demolition may be the best and most prudent option for the use of NSP funds. Though the exact number will not be known until a full assessment has taken place it is expected that approximately 39 dwelling units located in low- and moderate-income areas will be demolished as a result of NSP-assisted activities. All units rehabilitated or constructed with NSP funds will be made available to households making no more than 120% of the area median income (AMI).
2. Based upon conservative cost estimates, the twelve targeted communities will use NSP funds to acquire 83 abandoned or foreclosed housing units. 10 of those units may be cleared and the remaining 73 units will be rehabilitated for sale, lease-to-purchase, or rental to LMMI individuals and families.
3. Approximately 102 units will be made available to households making no more than 50% AMI.

*F. PUBLIC COMMENT* - Provide a summary of public comments received to the proposed NSP Substantial Amendment. *Note:* proposed NSP Substantial Amendment must be published via the usual methods and posted on the jurisdiction's website for no less than 15 calendar days for public comment.

**Response:** The Oakland County Contract Review process and subsequent request for Board of Commissioner authorization to prepare and submit this amendment provided several opportunities for public input: 1) Oakland County Budget Taskforce Meeting, September 30, 2008; 2) Community & Home Improvement Citizen Advisory Council Meeting, October 22, 2008; 3) Oakland County Board of Commissioners Planning and Building Committee Meeting, November 10, 2008; 4) Oakland County Board of Commissioners Finance Committee Meeting, November 13, 2008; 5) Oakland County Board of Commissioners Full Board Meeting, November 20, 2008. The publication for the 15-day comment period was completed from November 12, 2008 through November 27, 2008 in the Oakland Press. Several comments were received. The substantial amendment to the 2008 action plan was posted on the Oakland County web page at [www.oakgov.com/chi](http://www.oakgov.com/chi) from November 12, 2008 until November 27, 2008 and several comments were received. All comments were taken into consideration by the Oakland County Community & Home Improvement Division.

### ***Public Comments Received***

NSP regulations require all funds to be used within 18 months from the date of HUD signature on the grant agreements. Any funds not contractually obligated within 18 months must be returned to the federal government. Oakland County is requiring NSP funded communities to obligate funds within nine months allowing the County time to reallocate unobligated NSP funds and avoid federal recapture. In response to this requirement a consortium of areas of greatest need communities from southeast Oakland County including the Cities of Ferndale, Hazel Park, Lathrup Village, Madison Height, and Oak Park sent comments encouraging the County to lengthen its nine month timetable for obligation of NSP funds to eighteen months.

Oakland County Community & Home Improvement is a HUD approved housing counseling agency and maintains certified foreclosure counselors on staff. Oakland County is allocating NSP funds to a comprehensive financing/rehabilitation assistance program available throughout its fifty participating communities. In order to maintain control of the process and expedite services within the required NSP timeframe Oakland County has elected to hire one additional NSP foreclosure housing counselor. Oakland Livingston Human Service Agency (OLHSA) submitted a comment requesting the county to reconsider its decision and share some of the NSP housing counseling funds with their agency.

Oakland County recognizes that NSP funds may be used to address rental housing needs as a redevelopment activity and have included rental as an NSP activity in Section G. Community Housing Network submitted a comment recommending that the NSP substantial amendment include the development of affordable rental housing.

### ***Future amendments and opportunities for public comment***

Oakland County's Neighborhood Stabilization Program, as described in this document anticipates the generation of program income (net proceeds from resales). Programming and reuse of that program income for any of the activities already described in this document are contemplated by this program and therefore shall not be considered to be an amendment to this plan and shall not be subject to further public comment requirements.

Due to the emergency nature of this funding and the desire to implement and complete projects and activities as rapidly as possible, the reallocation of program funding between activities already described in this document is also contemplated by this plan. Therefore, such reallocations shall not be considered to be an amendment to this plan and shall not be subject to further public comment requirements.

The Community & Home Improvement Division along with corresponding local agencies are identified as the responsible parties in each of the activities described in this plan. The subsequent engagement of other municipal departments, non-profit service providers, contractors is possible and contemplated during the life of this plan. These engagements, if any, shall not be subject to public comment requirements. The addition of activities not already described in this plan or changes to the Oakland County NSP target area defined in Section B shall be treated as a substantial amendment to this NSP plan and shall be the subject of a 15-day public comment period. Any plan amendment, with or without a required public comment period as described above, shall be subject to any applicable local and federal requirements, reviews and approvals.

#### **G. NSP INFORMATION BY ACTIVITY**

(1) *Activity Name:*

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

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

(4) *Activity Description:*

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

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

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

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

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

(9) *Projected Start Date:*

(10) *Projected End Date:*

(11) *Specific Activity Requirements:*

*For acquisition activities, include:*

- *discount rate*

*For financing activities, include:*

- *range of interest rates*

*For housing related activities, include:*

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

**Response:** Oakland County proposes to use the NSP funds in the following manner; however, Oakland County reserves the right to shift funding from one activity to another and from one agency to another, as additional areas of greatest needs are identified, and according to availability of suitable properties, agency capacity, project readiness, and ability to meet the timeliness requirements of the NSP. Such shifting of funds from one activity to another shall not be considered a Substantial Amendment to the Action Plan. Notwithstanding the foregoing, under all circumstances a minimum of 25% of NSP funds will be used for housing individuals and families whose incomes do not exceed 50% of area median income.

NSP applicants must qualify based upon HUD income guidelines. Applicants must satisfy standard credit grading criteria and qualify for a fixed rate first mortgage. No arms or balloons allowed. All NSP mortgages must demonstrate that property taxes and homeowner's insurances will be escrowed as part of the first mortgage. Property purchased must be located in an Oakland County community participating in Oakland County's PY 2008 Community Development Block Grant program. The purchase price of the property may not exceed \$226,100. Homes purchased must be for the purchaser occupant. All homes must be permanently affixed to a slab, crawl space, or basement. Property purchased must be currently vacant or abandoned. Homes purchased with NSP funds may not displace an owner/tenant. The property may not be located in a 100 year flood plain. Homebuyers must execute a Mortgage and Note securing the property as collateral for NSP assistance. The loan is deferred with zero percent interest.

# 1. NSP FINANCING MECHANISMS (OAKLAND COUNTY)

1	Activity Name	NSP Financing Mechanisms (Oakland County)
2	Activity Type	NSP: Financing mechanisms CDBG: Downpayment Loan Financing (soft-second) and Rehabilitation Loan Financing (soft-second), Direct home ownership assistance (24 CFR 570.206 and 24 CFR 570.202)
3	National Objective	24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% of AMI)
4	Activity Description	Oakland County's Homebuyer Program offers down payment assistance, rehabilitation assistance or a combination of the two for the purchase of vacant residential properties that have been abandoned or foreclosed. These properties must be occupied by a qualified homebuyer as a primary residence. In addition, they must be located in one of the areas of greatest need. The County will provide 0% deferred loans as soft second financial assistance to households at or below 120% of Area Median Income (AMI) with an emphasis on serving households at or below 50% of AMI. The purchase price of the property must reflect at least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level of fifteen percent taking into account its current condition to ensure that the purchasers are paying below market value for the home. Homebuyers are required to complete eight hours of pre and post purchase housing counseling with Oakland County HUD approved housing counselors. This program will enable the homebuyer to purchase a home that meets Housing Quality Standards with improvements that meet MI Residential Code and keep monthly mortgage payments affordable. The total down payment and or rehabilitation assistance is subject to recapture when property ownership is transferred to another party based upon federal affordability requirements. The assistance will be secured with a mortgage and mortgage note. Households whose incomes are equal to or less than 120% AMI 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.
5	Location Description	Oakland County Areas of Greatest Need

Community	CT	BG	Community	CT	BG	Community	CT	BG
Auburn Hills	140100	1	Berkley	170000	1	Birmingham	152600	1
Auburn Hills	140600	1	Berkley	170000	2	Birmingham	152600	2
Auburn Hills	140800	1	Berkley	170000	3	Birmingham	152600	3
Auburn Hills	140300	2	Birmingham	152900	1	Birmingham	152600	4
Auburn Hills	140300	3	Birmingham	152900	2	Clawson	180200	1
Auburn Hills	140300	1	Birmingham	152900	3	Clawson	180200	2
Auburn Hills	140500	1	Birmingham	152900	4	Clawson	180200	3
Auburn Hills	140700	1	Birmingham	153000	1	Clawson	180200	4
Auburn Hills	192800	1	Birmingham	153000	2	Clawson	180200	5
Berkley	170100	1	Birmingham	153300	1	Clawson	180300	1
Berkley	170100	2	Birmingham	153300	2	Clawson	180300	2
Berkley	170300	1	Birmingham	153300	3	Clawson	180300	3
Berkley	170300	2	Birmingham	152700	1	Clawson	180000	1
Berkley	170200	1	Birmingham	152700	2	Clawson	180000	2
Berkley	170200	2	Birmingham	152700	3	Clawson	180100	1
Berkley	170200	3	Birmingham	152700	4	Clawson	180100	3
Berkley	170400	2	Birmingham	153100	1	Clawson	180100	2
Berkley	170400	4	Birmingham	153100	2	Farmington	165200	5
Berkley	170400	5	Birmingham	153100	3	Farmington	165200	8
Berkley	170400	1	Birmingham	153200	1	Farmington	165200	9
Berkley	170400	3	Birmingham	153200	2	Farmington	165000	2

Community	CT	BG	Community	CT	BG	Community	CT	BG
Farmington	165000	1	South Lyon	138100	1	Commerce twp	134200	2
Farmington	165000	3	Sylvan Lake	154000	3	Commerce twp	134500	1
Farmington	165100	1	Sylvan Lake	154000	1	Commerce twp	134100	9
Farmington	165100	2	Sylvan Lake	154000	2	Groveland twp	123000	1
Farmington	165100	3	Troy	198100	1	Groveland twp	123000	2
Novi	136100	1	Troy	197300	1	Groveland twp	123100	1
Novi	136100	2	Troy	197300	2	Groveland twp	123100	2
Novi	136100	3	Troy	197500	1	Highland twp	131600	1
Novi	136500	1	Troy	197400	1	Highland twp	131600	2
Novi	136700	1	Troy	197400	2	Highland twp	131100	1
Novi	136000	1	Troy	197400	3	Highland twp	131500	3
Novi	136600	1	Troy	197600	1	Highland twp	131500	1
Novi	136600	4	Troy	196900	1	Highland twp	131500	2
Novi	136600	9	Troy	196900	2	Highland twp	131400	1
Novi	136800	1	Troy	198000	1	Highland twp	131400	2
Novi	137400	1	Troy	198000	2	Highland twp	131800	2
Novi	136300	2	Troy	197000	1	Highland twp	131800	3
Novi	137100	1	Troy	197000	2	Highland twp	131800	1
Novi	137700	1	Troy	196700	1	Highland twp	131300	3
Rochester	191200	1	Troy	196000	1	Highland twp	131300	1
Rochester	191200	3	Troy	196000	2	Highland twp	131300	2
Rochester	191200	2	Troy	197700	2	Independence twp	127400	2
Rochester	191000	1	Troy	197700	1	Independence twp	127400	1
Rochester	191000	2	Troy	197700	3	Independence twp	127700	3
Rochester	191100	1	Troy	196500	1	Independence twp	127700	1
Rochester	191100	2	Troy	196100	1	Independence twp	127700	2
Rochester	191300	1	Troy	196100	2	Independence twp	127500	1
Rochester Hills	194500	1	Troy	197900	1	Independence twp	127500	2
Rochester Hills	193700	2	Troy	197900	2	Independence twp	127500	3
Rochester Hills	193700	3	Troy	196200	1	Independence twp	127300	1
Rochester Hills	193700	1	Troy	196200	2	Independence twp	127300	2
Rochester Hills	194000	1	Troy	196300	2	Independence twp	127300	3
Rochester Hills	194000	2	Troy	196300	1	Independence twp	127600	1
Rochester Hills	194000	3	Troy	197200	1	Independence twp	127000	1
Rochester Hills	193600	1	Troy	197200	2	Independence twp	127000	2
Rochester Hills	194600	1	Troy	197100	1	Independence twp	127000	3
Rochester Hills	194600	2	Troy	197100	2	Independence twp	127200	2
Rochester Hills	194600	3	Troy	196400	1	Independence twp	127200	1
Rochester Hills	193500	1	Troy	196400	2	Independence twp	127100	1
Rochester Hills	194400	1	Troy	196600	1	Independence twp	127100	2
Rochester Hills	194400	2	Troy	196800	1	Independence twp	127100	3
Rochester Hills	192000	1	Walled Lake	134900	2	Lyon twp	139400	2
Rochester Hills	192000	2	Walled Lake	134900	3	Lyon twp	139200	1
Rochester Hills	192000	3	Walled Lake	134900	1	Lyon twp	139200	2
Rochester Hills	192700	1	Walled Lake	134500	1	Lyon twp	139400	1
Rochester Hills	192700	2	Walled Lake	134700	1	Lyon twp	138600	1
Rochester Hills	193300	1	Wixom	133000	3	Lyon twp	138600	2
Rochester Hills	193300	2	Wixom	133000	1	Lyon twp	138300	1
Rochester Hills	193300	3	Wixom	133000	2	Lyon twp	138300	2
Rochester Hills	194200	1	Wixom	133100	1	Lyon twp	138100	1
Rochester Hills	194200	2	Wixom	133100	2	Lyon twp	138100	2
Rochester Hills	193100	3	Wixom	133000	4	Milford twp	132600	2
Rochester Hills	193100	1	Addison twp	120000	1	Milford twp	132600	1
Rochester Hills	193100	2	Addison twp	120000	2	Milford twp	132100	2
Rochester Hills	194300	1	Addison twp	120300	1	Milford twp	132100	1
Rochester Hills	194300	2	Addison twp	120300	2	Oakland twp	190500	1
Rochester Hills	192200	1	Brandon twp	122900	1	Oakland twp	190200	1
Rochester Hills	192200	2	Brandon twp	122700	1	Oakland twp	190400	2
Rochester Hills	192200	3	Brandon twp	122700	2	Oakland twp	190400	1
Rochester Hills	192400	1	Brandon twp	122200	2	Oakland twp	190300	1
Rochester Hills	192400	2	Brandon twp	122200	1	Oakland twp	190600	1
Rochester Hills	192400	3	Brandon twp	122400	3	Oakland twp	190700	1
Rochester Hills	192400	4	Brandon twp	122400	1	Oakland twp	190800	1
Rochester Hills	194100	2	Brandon twp	122400	2	Orion twp	128300	2
Rochester Hills	194100	1	Commerce twp	134400	2	Orion twp	128300	3
Rochester Hills	193000	1	Commerce twp	134400	1	Orion twp	128300	1
Rochester Hills	193000	2	Commerce twp	134400	3	Orion twp	128500	2
Rochester Hills	193000	3	Commerce twp	134000	1	Orion twp	128500	1
Rochester Hills	193000	4	Commerce twp	134000	2	Orion twp	128500	3
Rochester Hills	193400	1	Commerce twp	134000	3	Orion twp	128000	2
Rochester Hills	192500	1	Commerce twp	134000	4	Orion twp	128000	1
Rochester Hills	192500	2	Commerce twp	134300	1	Orion twp	128400	1
Rochester Hills	192800	1	Commerce twp	134300	2	Orion twp	128400	2
South Lyon	139400	1	Commerce twp	134300	3	Orion twp	128400	3
South Lyon	139200	1	Commerce twp	134200	3	Orion twp	128100	1
South Lyon	139200	2	Commerce twp	134800	1	Orion twp	128100	2
South Lyon	139400	2	Commerce twp	134200	1	Orion twp	128100	3



Community	CT	BG	Community	CT	BG	Community	CT	BG
Orion twp	128600	1	White Lake twp	130700	2	Royal Oak Twp	172500	1
Orion twp	128900	1	White Lake twp	130700	1	Royal Oak Twp	172500	2
Orion twp	128900	2	White Lake twp	130000	9	Madison Hts	181000	1
Orion twp	128200	1	White Lake twp	130500	1	Madison Hts	181000	2
Orion twp	128200	2	White Lake twp	130500	2	Madison Hts	181100	1
Orion twp	128800	1	White Lake twp	130400	1	Madison Hts	181100	2
Orion twp	128700	1	White Lake twp	130100	1	Madison Hts	181100	3
Oxford twp	121000	2	White Lake twp	130300	1	Madison Hts	181100	4
Oxford twp	121000	1	White Lake twp	130300	2	Madison Hts	181200	1
Oxford twp	121600	1	Leonard village	120000	1	Madison Hts	181200	2
Oxford twp	121600	2	Leonard village	120300	1	Madison Hts	181200	3
Oxford twp	121600	3	Milford village	132700	1	Madison Hts	181200	4
Oxford twp	121400	1	Milford village	132700	2	Madison Hts	181300	1
Springfield twp	126400	1	Milford village	132500	1	Madison Hts	181300	2
Springfield twp	126400	2	Milford village	132500	2	Madison Hts	181300	3
Springfield twp	126400	3	Milford village	132500	3	Madison Hts	181300	4
Springfield twp	126500	2	Milford village	132500	3	Madison Hts	181400	1
Springfield twp	126500	1	Oxford village	121500	2	Madison Hts	181400	2
Springfield twp	126200	1	Oxford village	121500	3	Madison Hts	181400	3
Springfield twp	126200	2	Oxford village	121500	1	Madison Hts	181400	4
Springfield twp	126300	1	Wolverine Lk Vlg	134600	3	Madison Hts	181400	4
Springfield twp	126300	2	Wolverine Lk Vlg	134600	1	Madison Hts	181500	1
W Bloomfield twp	154200	1	Wolverine Lk Vlg	134600	2	Madison Hts	181500	2
W Bloomfield twp	157500	1	Wolverine Lk Vlg	134500	1	Madison Hts	181600	1
W Bloomfield twp	157500	2	Hazel Park	175000	1	Madison Hts	181600	2
W Bloomfield twp	156900	3	Hazel Park	175000	2	Madison Hts	181600	3
W Bloomfield twp	156900	4	Hazel Park	175000	3	Madison Hts	181600	3
W Bloomfield twp	157100	1	Hazel Park	175000	4	Ferndale	173000	1
W Bloomfield twp	157100	5	Hazel Park	175100	1	Ferndale	173000	2
W Bloomfield twp	157600	1	Hazel Park	175100	2	Ferndale	173000	3
W Bloomfield twp	157600	2	Hazel Park	175100	3	Ferndale	173000	4
W Bloomfield twp	157600	3	Hazel Park	175100	4	Ferndale	173000	5
W Bloomfield twp	154600	1	Hazel Park	175100	5	Ferndale	173000	6
W Bloomfield twp	154600	2	Hazel Park	175100	6	Ferndale	173100	1
W Bloomfield twp	157400	1	Hazel Park	175100	7	Ferndale	173100	2
W Bloomfield twp	157300	1	Hazel Park	175100	7	Ferndale	173100	3
W Bloomfield twp	156500	1	Hazel Park	175200	1	Ferndale	173100	4
W Bloomfield twp	157000	1	Hazel Park	175200	2	Ferndale	173200	1
W Bloomfield twp	157000	2	Hazel Park	175200	3	Ferndale	173200	2
W Bloomfield twp	157700	1	Hazel Park	175200	4	Ferndale	173200	3
W Bloomfield twp	157800	1	Hazel Park	175200	5	Ferndale	173300	1
W Bloomfield twp	154100	1	Hazel Park	175200	6	Ferndale	173300	2
W Bloomfield twp	154100	2	Hazel Park	175300	1	Ferndale	173300	3
W Bloomfield twp	156200	1	Hazel Park	175300	2	Ferndale	173400	1
W Bloomfield twp	156200	2	Hazel Park	175300	3	Ferndale	173400	2
W Bloomfield twp	156200	3	Hazel Park	175300	4	Ferndale	173400	3
W Bloomfield twp	156200	4	Hazel Park	175300	5	Ferndale	173400	4
W Bloomfield twp	156200	5	Hazel Park	175300	6	Ferndale	173400	5
W Bloomfield twp	157200	1	Hazel Park	175300	7	Ferndale	173500	1
W Bloomfield twp	157200	2	Oak Park	175300	6	Ferndale	173500	2
W Bloomfield twp	156000	1	Oak Park	175300	7	Ferndale	173600	1
W Bloomfield twp	157900	1	Oak Park	171000	1	Keego Harbor	154200	1
W Bloomfield twp	157900	2	Oak Park	171000	2	Keego Harbor	154200	2
W Bloomfield twp	156000	2	Oak Park	171000	3	Keego Harbor	154200	3
W Bloomfield twp	156000	3	Oak Park	171000	4	Holly Vlg	124500	4
W Bloomfield twp	156000	4	Oak Park	171000	5	Holly Vlg	124500	5
W Bloomfield twp	156100	1	Oak Park	171100	1	Holly Vlg	124500	6
W Bloomfield twp	156400	1	Oak Park	171100	2	Holly Vlg	124500	7
W Bloomfield twp	156400	2	Oak Park	171100	3	Ortonville	122900	1
W Bloomfield twp	156300	1	Oak Park	171200	1	Rose Twp	125000	1
W Bloomfield twp	156300	2	Oak Park	171200	2	Rose Twp	125000	2
W Bloomfield twp	156300	3	Oak Park	171200	3	Rose Twp	125600	1
White Lake twp	130600	3	Oak Park	171300	1	Rose Twp	125600	2
White Lake twp	130600	1	Oak Park	171300	2	Holly Twp	124000	1
White Lake twp	130600	2	Oak Park	171300	2	Holly Twp	124000	2
White Lake twp	130200	1	Oak Park	171400	1	Holly Twp	124000	3
White Lake twp	130200	2	Oak Park	171400	2	Holly Twp	124000	3
White Lake twp	130200	3	Oak Park	171400	3	Lathrup Village	160000	1
			Oak Park	171400	4	Lathrup Village	160000	2
			Oak Park	171400	5	Lathrup Village	160000	3
			Oak Park	171500	1	Lathrup Village	160000	4
			Oak Park	171500	2	Lathrup Village	160000	5
			Oak Park	171600	1	Lathrup Village	160000	6
			Oak Park	172400	1	Lake Orion Vlg	129000	1
						Lake Orion Vlg	129000	2
						Lake Orion Vlg	129000	3

1. NSP FINANCING MECHANISMS (OAKLAND COUNTY) cont.

6	Performance Measures	Single Family Owner Occupied Housing Units <ul style="list-style-type: none"> <li>▪ 50% AMI or less: 25</li> <li>▪ 51-80% AMI: 25</li> <li>▪ 81-120% AMI: 50</li> </ul>
7	Total Budget	NSP: \$4,998,467
8	Responsible Organization	Karry L. Rieth, Manager, Oakland County Community & Home Improvement, 250 Elizabeth Lake Rd Ste 1900, Pontiac, MI 48341-0414.
9	Projected Start Date	February 2009
10	Projected End Date	July 2013
11	Specific Activity Requirements <ul style="list-style-type: none"> <li>a. discount rate</li> <li>b. range of interest rates</li> <li>c. duration or term of assistance;</li> <li>d. tenure of beneficiaries</li> <li>e. ensuring continued affordability</li> </ul>	ERR Classification: Exempt, Categorically Excluded <ul style="list-style-type: none"> <li>a. At least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level</li> <li>b. 0% deferred loans as soft seconds</li> <li>c. Forever</li> <li>d. Single Family Owner Occupied Housing Units</li> <li>e. Assistance secured with mortgage/mortgage note and subject to recapture of the entire amount of the NSP investment from the homeowner when ownership is transferred.</li> </ul>

## 2. PUBLIC SERVICES – HOUSING COUNSELING (OAKLAND COUNTY)

1	Activity Name	Public Services – Housing Counseling (Oakland County)
2	Activity Type	NSP: Purchase, rehab, and re-sell foreclosed properties (homebuyer counseling is required); CDBG: 24 CFR 570.201(e) Public services for housing counseling
3	National Objective	24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% of AMI)
4	Activity Description	This activity will provide the homebuyer counseling required under the NSP. Counseling services may include, but are not limited to, eight required hours of counseling, individual financial literacy assistance, individual case management and follow-up. Counseling services will only be provided to NSP clients.
5	Location Description	Oakland County NSP Areas of Greatest Need

Community	CT	BG	Community	CT	BG	Community	CT	BG
Auburn Hills	140100	1	Clawson	180100	1	Rochester Hills	194200	1
Auburn Hills	140600	1	Clawson	180100	3	Rochester Hills	194200	2
Auburn Hills	140800	1	Clawson	180100	2	Rochester Hills	193100	3
Auburn Hills	140300	2	Farmington	165200	5	Rochester Hills	193100	1
Auburn Hills	140300	3	Farmington	165200	8	Rochester Hills	193100	2
Auburn Hills	140300	1	Farmington	165200	9	Rochester Hills	194300	1
Auburn Hills	140500	1	Farmington	165000	2	Rochester Hills	194300	2
Auburn Hills	140700	1	Farmington	165000	1	Rochester Hills	192200	1
Auburn Hills	192800	1	Farmington	165000	3	Rochester Hills	192200	2
Berkley	170100	1	Farmington	165100	1	Rochester Hills	192200	3
Berkley	170100	2	Farmington	165100	2	Rochester Hills	192400	1
Berkley	170300	1	Farmington	165100	3	Rochester Hills	192400	2
Berkley	170300	2	Novi	136100	1	Rochester Hills	192400	3
Berkley	170200	1	Novi	136100	2	Rochester Hills	192400	4
Berkley	170200	2	Novi	136100	3	Rochester Hills	194100	2
Berkley	170200	3	Novi	136500	1	Rochester Hills	194100	1
Berkley	170400	2	Novi	136700	1	Rochester Hills	193000	1
Berkley	170400	4	Novi	136000	1	Rochester Hills	193000	2
Berkley	170400	5	Novi	136600	1	Rochester Hills	193000	3
Berkley	170400	1	Novi	136600	4	Rochester Hills	193000	4
Berkley	170400	3	Novi	136600	9	Rochester Hills	193400	1
Berkley	170000	1	Novi	136800	1	Rochester Hills	192500	1
Berkley	170000	2	Novi	137400	1	Rochester Hills	192500	2
Berkley	170000	3	Novi	136300	2	Rochester Hills	192800	1
Birmingham	152900	1	Novi	137100	1	South Lyon	139400	1
Birmingham	152900	2	Novi	137700	1	South Lyon	139200	1
Birmingham	152900	3	Rochester	191200	1	South Lyon	139200	2
Birmingham	152900	4	Rochester	191200	3	South Lyon	139400	2
Birmingham	153000	1	Rochester	191200	2	South Lyon	138100	1
Birmingham	153000	2	Rochester	191000	1	Sylvan Lake	154000	3
Birmingham	153300	1	Rochester	191000	2	Sylvan Lake	154000	1
Birmingham	153300	2	Rochester	191100	1	Sylvan Lake	154000	2
Birmingham	153300	3	Rochester	191100	2	Troy	198100	1
Birmingham	152700	1	Rochester	191300	1	Troy	197300	1
Birmingham	152700	2	Rochester Hills	194500	1	Troy	197300	2
Birmingham	152700	3	Rochester Hills	193700	2	Troy	197500	1
Birmingham	152700	4	Rochester Hills	193700	3	Troy	197400	1
Birmingham	153100	1	Rochester Hills	193700	1	Troy	197400	2
Birmingham	153100	2	Rochester Hills	194000	1	Troy	197400	3
Birmingham	153100	3	Rochester Hills	194000	2	Troy	197600	1
Birmingham	153200	1	Rochester Hills	194000	3	Troy	196900	1
Birmingham	153200	2	Rochester Hills	194000	3	Troy	196900	2
Birmingham	152600	1	Rochester Hills	193600	1	Troy	198000	1
Birmingham	152600	2	Rochester Hills	194600	1	Troy	198000	2
Birmingham	152600	3	Rochester Hills	194600	2	Troy	198000	2
Birmingham	152600	4	Rochester Hills	194600	3	Troy	197000	1
Clawson	180200	1	Rochester Hills	193500	1	Troy	197000	2
Clawson	180200	2	Rochester Hills	194400	1	Troy	196700	1
Clawson	180200	3	Rochester Hills	194400	2	Troy	196700	1
Clawson	180200	4	Rochester Hills	192000	1	Troy	196000	1
Clawson	180200	5	Rochester Hills	192000	2	Troy	196000	2
Clawson	180300	1	Rochester Hills	192000	2	Troy	197700	2
Clawson	180300	2	Rochester Hills	192000	3	Troy	197700	1
Clawson	180300	3	Rochester Hills	192700	1	Troy	197700	3
Clawson	180000	1	Rochester Hills	192700	2	Troy	196500	1
Clawson	180000	2	Rochester Hills	192700	2	Troy	196100	1
Clawson	180000	2	Rochester Hills	193300	1	Troy	196100	2
Clawson	180000	2	Rochester Hills	193300	2	Troy	196100	2
Clawson	180000	2	Rochester Hills	193300	3	Troy	197900	1

Community	CT	BG	Community	CT	BG	Community	CT	BG
Troy	197900	2	Independence twp	127500	2	West Bloomfield twp	157100	1
Troy	196200	1	Independence twp	127500	3	West Bloomfield twp	157100	5
Troy	196200	2	Independence twp	127300	1	West Bloomfield twp	157600	1
Troy	196300	2	Independence twp	127300	2	West Bloomfield twp	157600	2
Troy	196300	1	Independence twp	127300	3	West Bloomfield twp	157600	3
Troy	197200	1	Independence twp	127600	1	West Bloomfield twp	154600	1
Troy	197200	2	Independence twp	127000	1	West Bloomfield twp	154600	2
Troy	197100	1	Independence twp	127000	2	West Bloomfield twp	157400	1
Troy	197100	2	Independence twp	127000	3	West Bloomfield twp	157300	1
Troy	196400	1	Independence twp	127200	2	West Bloomfield twp	156500	1
Troy	196400	2	Independence twp	127200	1	West Bloomfield twp	157000	1
Troy	196600	1	Independence twp	127100	1	West Bloomfield twp	157000	2
Troy	196800	1	Independence twp	127100	2	West Bloomfield twp	157700	1
Walled Lake	134900	2	Independence twp	127100	3	West Bloomfield twp	157800	1
Walled Lake	134900	3	Lyon twp	139400	2	West Bloomfield twp	154100	1
Walled Lake	134900	1	Lyon twp	139200	1	West Bloomfield twp	154100	2
Walled Lake	134500	1	Lyon twp	139200	2	West Bloomfield twp	156200	1
Walled Lake	134700	1	Lyon twp	139400	1	West Bloomfield twp	156200	2
Wixom	133000	3	Lyon twp	138600	1	West Bloomfield twp	156200	3
Wixom	133000	1	Lyon twp	138600	2	West Bloomfield twp	156200	4
Wixom	133000	2	Lyon twp	138300	1	West Bloomfield twp	156200	5
Wixom	133100	1	Lyon twp	138300	2	West Bloomfield twp	157200	1
Wixom	133100	2	Lyon twp	138100	1	West Bloomfield twp	157200	2
Wixom	133000	4	Lyon twp	138100	2	West Bloomfield twp	156000	1
Addison twp	120000	1	Milford twp	132600	2	West Bloomfield twp	157900	1
Addison twp	120000	2	Milford twp	132600	1	West Bloomfield twp	157900	2
Addison twp	120300	1	Milford twp	132100	2	West Bloomfield twp	156000	2
Addison twp	120300	2	Milford twp	132100	1	West Bloomfield twp	156000	3
Brandon twp	122900	1	Oakland twp	190500	1	West Bloomfield twp	156000	4
Brandon twp	122700	1	Oakland twp	190200	1	West Bloomfield twp	156100	1
Brandon twp	122700	2	Oakland twp	190400	2	West Bloomfield twp	156100	2
Brandon twp	122200	2	Oakland twp	190400	1	West Bloomfield twp	156400	1
Brandon twp	122200	1	Oakland twp	190300	1	West Bloomfield twp	156400	2
Brandon twp	122400	3	Oakland twp	190600	1	West Bloomfield twp	156300	1
Brandon twp	122400	1	Oakland twp	190700	1	West Bloomfield twp	156300	2
Brandon twp	122400	2	Oakland twp	190800	1	West Bloomfield twp	156300	3
Commerce twp	134400	2	Orion twp	128300	2	White Lake twp	130600	3
Commerce twp	134400	1	Orion twp	128300	3	White Lake twp	130600	1
Commerce twp	134400	3	Orion twp	128300	1	White Lake twp	130600	2
Commerce twp	134000	1	Orion twp	128500	2	White Lake twp	130200	1
Commerce twp	134000	2	Orion twp	128500	1	White Lake twp	130200	2
Commerce twp	134000	3	Orion twp	128500	3	White Lake twp	130200	3
Commerce twp	134000	4	Orion twp	128000	2	White Lake twp	130700	2
Commerce twp	134300	1	Orion twp	128000	1	White Lake twp	130700	1
Commerce twp	134300	2	Orion twp	128400	1	White Lake twp	130000	9
Commerce twp	134300	3	Orion twp	128400	2	White Lake twp	130500	1
Commerce twp	134200	3	Orion twp	128400	3	White Lake twp	130500	2
Commerce twp	134800	1	Orion twp	128100	1	White Lake twp	130400	1
Commerce twp	134200	1	Orion twp	128100	2	White Lake twp	130100	1
Commerce twp	134200	2	Orion twp	128100	3	White Lake twp	130300	1
Commerce twp	134500	1	Orion twp	128600	1	White Lake twp	130300	2
Commerce twp	134100	9	Orion twp	128900	1	Leonard village	120000	1
Groveland twp	123000	1	Orion twp	128900	2	Leonard village	120300	1
Groveland twp	123000	2	Orion twp	128200	1	Milford village	132700	1
Groveland twp	123100	1	Orion twp	128200	2	Milford village	132700	2
Groveland twp	123100	2	Orion twp	128800	1	Milford village	132500	1
Highland twp	131600	1	Orion twp	128700	1	Milford village	132500	2
Highland twp	131600	2	Oxford twp	121000	2	Milford village	132500	3
Highland twp	131100	1	Oxford twp	121000	1	Oxford village	121500	2
Highland twp	131500	3	Oxford twp	121600	1	Oxford village	121500	3
Highland twp	131500	1	Oxford twp	121600	2	Oxford village	121500	1
Highland twp	131500	2	Oxford twp	121600	3	Wolverine Lk Vlg	134600	3
Highland twp	131400	1	Oxford twp	121400	1	Wolverine Lk Vlg	134600	1
Highland twp	131400	2	Springfield twp	126400	1	Wolverine Lk Vlg	134600	2
Highland twp	131800	2	Springfield twp	126400	2	Wolverine Lk Vlg	134500	1
Highland twp	131800	3	Springfield twp	126400	3	Hazel Park	175000	1
Highland twp	131800	1	Springfield twp	126500	2	Hazel Park	175000	2
Highland twp	131300	3	Springfield twp	126500	1	Hazel Park	175000	3
Highland twp	131300	1	Springfield twp	126200	1	Hazel Park	175000	4
Highland twp	131300	2	Springfield twp	126200	2	Hazel Park	175100	1
Independence twp	127400	2	Springfield twp	126300	1	Hazel Park	175100	2
Independence twp	127400	1	Springfield twp	126300	2	Hazel Park	175100	3
Independence twp	127700	3	West Bloomfield twp	154200	1	Hazel Park	175100	4
Independence twp	127700	1	West Bloomfield twp	157500	1	Hazel Park	175100	5
Independence twp	127700	2	West Bloomfield twp	157500	2	Hazel Park	175100	6
Independence twp	127500	1	West Bloomfield twp	156900	3	Hazel Park	175100	7
			West Bloomfield twp	156900	4	Hazel Park	175200	1

Community	CT	BG	Community	CT	BG	Community	CT	BG
Hazel Park	175200	2	Royal Oak Twp	172500	2	Ferndale	173200	3
Hazel Park	175200	3	Madison Heights	181000	1	Ferndale	173300	1
Hazel Park	175200	4	Madison Heights	181000	2	Ferndale	173300	2
Hazel Park	175200	5	Madison Heights	181100	1	Ferndale	173400	1
Hazel Park	175200	6	Madison Heights	181100	2	Ferndale	173400	2
Hazel Park	175300	1	Madison Heights	181100	3	Ferndale	173400	3
Hazel Park	175300	2	Madison Heights	181100	4	Ferndale	173400	4
Hazel Park	175300	3	Madison Heights	181200	1	Ferndale	173400	5
Hazel Park	175300	4	Madison Heights	181200	2	Ferndale	173500	1
Hazel Park	175300	5	Madison Heights	181200	3	Ferndale	173500	2
Hazel Park	175300	6	Madison Heights	181200	4	Ferndale	173600	1
Hazel Park	175300	7	Madison Heights	181300	1	Keego Harbor	154200	1
Oak Park	171000	1	Madison Heights	181300	2	Keego Harbor	154200	2
Oak Park	171000	2	Madison Heights	181300	3	Keego Harbor	154200	3
Oak Park	171000	3	Madison Heights	181300	4	Holly Vlg	124500	4
Oak Park	171000	4	Madison Heights	181400	1	Holly Vlg	124500	5
Oak Park	171000	5	Madison Heights	181400	2	Holly Vlg	124500	6
Oak Park	171100	1	Madison Heights	181400	3	Holly Vlg	124500	7
Oak Park	171100	2	Madison Heights	181400	4	Ortonville	122900	1
Oak Park	171100	3	Madison Heights	181500	1	Rose Twp	125000	1
Oak Park	171200	1	Madison Heights	181500	2	Rose Twp	125000	2
Oak Park	171200	2	Madison Heights	181600	1	Rose Twp	125600	1
Oak Park	171200	3	Madison Heights	181600	2	Rose Twp	125600	2
Oak Park	171300	1	Madison Heights	181600	3	Holly Twp	124000	1
Oak Park	171300	2	Ferndale	173000	1	Holly Twp	124000	2
Oak Park	171400	1	Ferndale	173000	2	Holly Twp	124000	3
Oak Park	171400	2	Ferndale	173000	3	Lathrup Village	160000	1
Oak Park	171400	3	Ferndale	173000	4	Lathrup Village	160000	2
Oak Park	171400	4	Ferndale	173000	5	Lathrup Village	160000	3
Oak Park	171400	5	Ferndale	173000	6	Lathrup Village	160000	4
Oak Park	171500	1	Ferndale	173100	1	Lathrup Village	160000	5
Oak Park	171500	2	Ferndale	173100	2	Lathrup Village	160000	6
Oak Park	171600	1	Ferndale	173100	3	Lake Orion Vlg	129000	1
Oak Park	172400	1	Ferndale	173200	1	Lake Orion Vlg	129000	2
Royal Oak Twp	172500	1	Ferndale	173200	2	Lake Orion Vlg	129000	3

6	Performance measures	100% of homebuyers under the NSP program will complete at least eight hours of homebuyer counseling.
7	Total Budget	NSP: \$650,000
8	Responsible Organization	Karry L. Rieth, Manager, Oakland County Community & Home Improvement, 250 Elizabeth Lake Rd Ste 1900, Pontiac, MI 48341-0414.
9	Projected Start Date	February 2009
10	Projected End Date	July 2013
11	Specific Activity Requirements d. tenure of beneficiaries	ERR Classification: Exempt d. Homebuyer and Renter

### 3. ADMINISTRATION (OAKLAND COUNTY)

1	Activity Name	Administration
2	Activity Type	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
3	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)
4	Activity Description	Activity Description Program administration costs associated with implementation of the Oakland County Neighborhood Stabilization Program. Funding for general grant administration and planning activities. Activity may include appraisal, inspection, and other project soft costs for properties that are not moved forward to completion.
5	Location Description	Oakland County Community & Home Improvement, 250 Elizabeth Lake Rd Ste 1900, Pontiac, MI 48341-0414.
6	Performance Measures	Oakland County will complete necessary planning activities to receive NSP funds; 100% of NSP funds will be accurately administered
7	Total Budget	NSP: \$1,738,377 plus 10% of NSP program income over the five year program period beginning with pre-award activities as of September 29, 2008. Should this activity not require the allowed amount of administration funds, these funds may be re-assigned to other NSP activities and such re-assignment shall not be considered a Substantial Amendment to the Action Plan.
8	Responsible Organization	Karry L. Rieth, Manager, Oakland County Community & Home Improvement, 250 Elizabeth Lake Rd Ste 1900, Pontiac, MI 48341-0414.
9	Projected Start Date	September 29, 2008 (Federal Register, Vol. 73, No. 194, II. C. allows reimbursement for pre-award costs)
10	Projected End Date	July 2013; however, monitoring of projects and receipt of program income through recapture will continue indefinitely
11	Specific Activity Requirements	ERR Classification: Exempt

**4. NSP FINANCING MECHANISMS  
(TOP QUARTILE AREAS OF GREATEST NEED)**

1	Activity Name	NSP Financing Mechanisms (Top Quartile Areas Of Greatest Need)
2	Activity Type	NSP: Financing mechanisms CDBG: Downpayment Loan Financing (soft-second) and Rehabilitation Loan Financing (soft-second), Direct home ownership assistance (24 CFR 570.206 and 24 CFR 570.202)
3	National Objective	24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% of AMI)
4	Activity description	NSP top quartile areas of greatest need communities (subrecipients) may self administer or contract for the administration of this project with a participating entity (qualified pre-approved developers, both for-profit and non-profit). This activity will address neighborhood stabilization as the subrecipient will offer down payment assistance, rehabilitation assistance or a combination of the two for the purchase of vacant residential properties that have been abandoned or foreclosed. These properties must be occupied by a qualified homebuyer as a primary residence and located in an NSP top quartile areas of greatest need. The subrecipient will provide 0% deferred loans as soft second financial assistance to households at or below 120% of AMI with an emphasis on serving households at or below 50% of AMI who may directly purchase foreclosed properties without title to passing through Oakland County. This program will enable the homebuyer to purchase a home that meets housing quality standards with improvements that meet mi residential code and keep monthly mortgage payments affordable. It is anticipated that this activity will be used to meet the requirement that 25% of the NSP grant be used to assist households making no more than 50% AMI, though in some cases, the eligible homebuyers may have higher incomes. Specific locations within the top quartile areas of greatest need communities will be identified at the time NSP funds are available for drawdown and as the program progresses. Purchase of specific properties will be dependent on availability of foreclosed moderately priced properties. The term of assistance may be as long as until the homebuyer sells the home or the home is no longer the homebuyer's principal residence. Funds received by Oakland county from the subrecipient in repayment of such loans may be retained and treated as CDBG funds to be used in accordance with section 2301 of HERA. All homes will be monitored per home guidelines and will follow the home affordability requirements. The total down payment and or rehabilitation assistance is subject to recapture when property ownership is transferred to another party. The assistance will be secured with a mortgage and mortgage note. The purchase price of the property must reflect at least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level of fifteen percent taking into account its current condition to ensure that the purchasers are paying below market value for the home. Homebuyers are required to complete eight hours of pre and post purchase housing counseling with Oakland County HUD approved housing counselors. Households whose

		incomes are equal to or less than 120% AMI must qualify for a 30 year fixed rate mortgage based on 51% of the home's final cost including purchase price and rehabilitation. The subrecipient will finance 49% of the cost for down payment assistance and/or rehabilitation.
5	Location Description	Oakland County NSP Top Quartile Areas of Greatest Need

Community	CT	BG
Holly Vlg	124500	4
Holly Vlg	124500	5
Holly Vlg	124500	6
Holly Vlg	124500	7

6	Performance Measures	<p>Single Family Owner Occupied Housing Units</p> <ul style="list-style-type: none"> <li>▪ 50% AMI or less: 5</li> <li>▪ 51-80% AMI: 5</li> <li>▪ 81-120% AMI: 5</li> </ul>
7	Total Budget	NSP: \$612,593.07 Holly Village
8	Responsible Organization	Jeff Wren, Building Ofc, Holly Village, 202 S Saginaw, Holy MI 48442
9	Projected Start Date	February 2009
10	Projected End Date	July 2013
11	<p>Specific Activity Requirements</p> <ul style="list-style-type: none"> <li>a. discount rate</li> <li>b. range of interest rates</li> <li>c. duration or term of assistance;</li> <li>d. tenure of beneficiaries</li> <li>e. ensuring continued affordability</li> </ul>	<p>ERR Classification: Exempt, Categorically Excluded</p> <ul style="list-style-type: none"> <li>a. At least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level</li> <li>b. 0% deferred loans as soft seconds</li> <li>c. May be as long as until the homebuyer sells the home or the home is no longer the homebuyer's principal residence.</li> <li>d. Single Family Owner Occupied Housing Units.</li> <li>e. Assistance secured with mortgage/mortgage note and subject to HOME recapture provisions. The subrecipient may reduce the NSP investment amount to be recaptured on a prorata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period.</li> </ul>



**5. NSP FINANCING MECHANISMS DOWNPAYMENT ASSISTANCE (DPA)  
(TOP QUARTILE AREAS OF GREATEST NEED)**

1	Activity Name	NSP Financing Mechanisms DPA (Top Quartile Areas of Greatest Need)
2	Activity Type	NSP: Financing mechanisms, CDBG: Downpayment Financing, Direct home ownership assistance (24 CFR 570.206 and 24 CFR 570.202)
3	National Objective	24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% of AMI)
4	Activity Description	Down payment assistance for the purchase of vacant residential properties that have been abandoned or foreclosed. These properties must be occupied by a qualified homebuyer as a primary residence with financial assistance to households at or below 120% AMI with an emphasis on serving households at or below 50% AMI. The purchase price of the property must reflect at least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level of fifteen percent taking into account its current condition to ensure that the purchasers are paying below market value for the home. Homebuyers are required to complete eight hours of pre and post purchase housing counseling with Oakland County HUD approved housing counselors. All homes will be monitored per HOME guidelines and will follow the HOME affordability requirements. The total down payment and or rehabilitation assistance is subject to recapture when property ownership is transferred to another party. The assistance will be secured with a mortgage and mortgage note.
5	Location Description	Oakland County NSP Top Quartile Areas of Greatest Need

Community      CT      BG  
Ortonville      122900      1

6	Performance Measures	Single Family Owner Occupied Housing Units <ul style="list-style-type: none"> <li>▪ 50% AMI or less: 1</li> <li>▪ 51-80% AMI: 1</li> <li>▪ 81-120% AMI: 1</li> </ul>
7	Total Budget	NSP: \$75,000 Ortonville
8	Responsible Organization	Ed Coy, Mgr, Vlg of Ortonville, 476 Mill St POB 928, Ortonville, MI 48462-0928
9	Projected Start Date	February 2009
10	Projected End Date	July 2013
11	Specific Activity Requirements <ul style="list-style-type: none"> <li>a. discount rate</li> <li>b. range of interest rates</li> <li>c. duration or term of assistance;</li> <li>d. tenure of beneficiaries</li> <li>e. ensuring continued affordability</li> </ul>	ERR Classification: Exempt <ul style="list-style-type: none"> <li>a. At least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level</li> <li>b. 0% deferred loans as soft seconds</li> <li>c. Maximum 15% (capped at 5 years) in accordance with the resale/recapture conditions of the federal affordability requirements.</li> <li>d. Single family owner/tenant occupied housing units</li> <li>e. Assistance secured with mortgage/mortgage note and subject to HOME recapture provisions. The subrecipient may reduce the NSP investment amount to be recaptured on a prorata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period.</li> </ul>

**6. ACQUISITION REHABILITATION RESALE (HOMEOWNER/RENTER)  
(TOP QUARTILE AREAS OF GREATEST NEED)**

1	Activity Name	Acquisition Rehabilitation Resale (Homeowner/Renter)
2	Activity Type	NSP: Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties. Finance Mechanisms CDBG: Eligible rehabilitation and preservation activities 24 CFR 570.202, Acquisition (570.201a), Disposition (570.201b), and Homeownership Assistance (570.201n).
3	National Objective	24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% of AMI)
4	Activity Description	<p>After acquiring properties that it was determined will be rehabilitated for sale/rental to owner-occupants/tenants, the subrecipient may either self administer or assign the properties to participating entities (qualified pre-approved developers, both for-profit and non-profit) who will be responsible for the activity. After rehabilitation the units will be sold/leased to households making no more than 120% AMI. It is anticipated that this activity will be used to meet the requirement that 25% of the NSP grant be used to assist households making no more than 50% AMI, though in some cases, the eligible homebuyers/tenants may have higher incomes. The specific properties will be identified at the time the NSP funds are available for drawdown and as the program progresses. Purchase of specific foreclosed properties will be dependent on availability of foreclosed moderately priced properties. Subrecipients will partner with responsible entities to select properties in the top quartile areas of greatest need that help meet the needs of individuals/families meeting the income requirements established for this activity. Disposition of these properties to responsible entities may include outright sale to or an equity sharing agreement. Program income obtained from disposition under any arrangement may be used to expand the scope of this activity and grow the number of units to be available to individuals/families meeting program requirement. These homes will be monitored through the same process that is used to monitor HOME projects. These properties must be occupied by qualified homebuyers/renters as their primary residence. The purchase price of the property must reflect at least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level of fifteen percent taking into account its current condition to ensure that the purchasers are paying below market value for the home. This program will enable the homebuyer/renter to purchase/lease a home that meets Housing Quality Standards with improvements that meet MI Residential Code and keep monthly mortgage payments affordable. The period of affordability for each NSP assisted unit will be modeled after the HOME affordability requirements and based on the amount of permanent subsidy. All homebuyers receiving assistance through this activity are required to complete eight hours of pre and post purchase housing counseling with Oakland County HUD approved housing counselors. In order to meet the objective of homeownership, the subrecipients may offer</p>

		potential homebuyers several options to achieve that goal including: lease with option to buy in a specified time frame; outright purchase with the potential for down payment and closing cost assistance in the form of a 0% interest payment deferred loans, or a shared equity agreement. If a home acquired through this homebuyer activity is not able to be sold to a homebuyer within a reasonable period of time such home may be temporarily rented to a household at less than 120% AMI and sold at a later date or leased with option to buy to an income qualified household. The total down payment and or rehabilitation assistance is subject to recapture when property ownership is transferred to another party based upon federal affordability requirements. The assistance will be secured with a mortgage and mortgage note.
5	Location Description	Oakland County NSP Top Quartile Areas of Greatest Need

Community	CT	BG	Community	CT	BG	Community	CT	BG
Hazel Park	175000	1	Oak Park	171400	2	Ferndale	173100	1
Hazel Park	175000	2	Oak Park	171400	3	Ferndale	173100	2
Hazel Park	175000	3	Oak Park	171400	4	Ferndale	173100	3
Hazel Park	175000	4	Oak Park	171400	5	Ferndale	173200	1
Hazel Park	175100	1	Oak Park	171500	1	Ferndale	173200	2
Hazel Park	175100	2	Oak Park	171500	2	Ferndale	173200	3
Hazel Park	175100	3	Oak Park	171600	1	Ferndale	173300	1
Hazel Park	175100	4	Oak Park	172400	1	Ferndale	173300	2
Hazel Park	175100	5	Royal Oak Twp	172500	1	Ferndale	173400	1
Hazel Park	175100	6	Royal Oak Twp	172500	2	Ferndale	173400	2
Hazel Park	175100	7	Madison Heights	181000	1	Ferndale	173400	3
Hazel Park	175200	1	Madison Heights	181000	2	Ferndale	173400	4
Hazel Park	175200	2	Madison Heights	181100	1	Ferndale	173400	5
Hazel Park	175200	3	Madison Heights	181100	2	Ferndale	173500	1
Hazel Park	175200	4	Madison Heights	181100	3	Ferndale	173500	2
Hazel Park	175200	5	Madison Heights	181100	4	Ferndale	173600	1
Hazel Park	175200	6	Madison Heights	181200	1	Keego Harbor	154200	1
Hazel Park	175300	1	Madison Heights	181200	2	Keego Harbor	154200	2
Hazel Park	175300	2	Madison Heights	181200	3	Keego Harbor	154200	3
Hazel Park	175300	3	Madison Heights	181200	4	Ortonville	122900	1
Hazel Park	175300	4	Madison Heights	181300	1	Rose Twp	125000	1
Hazel Park	175300	5	Madison Heights	181300	2	Rose Twp	125000	2
Hazel Park	175300	6	Madison Heights	181300	3	Rose Twp	125600	1
Hazel Park	175300	7	Madison Heights	181400	1	Rose Twp	125600	2
Oak Park	171000	1	Madison Heights	181400	2	Holly Twp	124000	1
Oak Park	171000	2	Madison Heights	181400	3	Holly Twp	124000	2
Oak Park	171000	3	Madison Heights	181400	4	Holly Twp	124000	3
Oak Park	171000	4	Madison Heights	181500	1	Lathrup Village	160000	1
Oak Park	171000	5	Madison Heights	181500	2	Lathrup Village	160000	2
Oak Park	171100	1	Madison Heights	181600	1	Lathrup Village	160000	3
Oak Park	171100	2	Madison Heights	181600	2	Lathrup Village	160000	4
Oak Park	171100	3	Madison Heights	181600	3	Lathrup Village	160000	5
Oak Park	171200	1	Ferndale	173000	1	Lathrup Village	160000	6
Oak Park	171200	2	Ferndale	173000	2	Lake Orion Vlg	129000	1
Oak Park	171200	3	Ferndale	173000	3	Lake Orion Vlg	129000	2
Oak Park	171300	1	Ferndale	173000	4	Lake Orion Vlg	129000	3
Oak Park	171300	2	Ferndale	173000	5			
Oak Park	171400	1	Ferndale	173000	6			

6	Performance Measures	<p>Single Family Owner Occupied Housing Units</p> <ul style="list-style-type: none"> <li>▪ <b>50% AMI or less</b> <ul style="list-style-type: none"> <li>4 Ferndale 1 Holly Twp 1 Ortonville</li> <li>10 Hazel Park 3 Keego Harbor</li> <li>3 Lathrup Village 4 Madison Heights</li> <li>4 Oak Park 1 Rose Twp</li> <li>3 Royal Oak Twp 1 Lake Orion</li> </ul> </li> <li>▪ <b>51-80% AMI</b> <ul style="list-style-type: none"> <li>4 Ferndale 2 Lathrup Village 3 Royal Oak Twp</li> <li>4 Hazel Park 5 Oak Park 1 Lake Orion</li> <li>3 Keego Harbor 1 Rose Twp 1 Ortonville</li> </ul> </li> <li>▪ <b>81-120% AMI</b> <ul style="list-style-type: none"> <li>4 Ferndale 2 Lathrup Village 3 Hazel Park</li> <li>5 Oak Park 3 Keego Harbor 1 Ortonville</li> </ul> </li> </ul>
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7	Total Budget	NSP: \$5,979,171.16 Ferndale \$1,115,160.44 Hazel Park \$760,785.41 Keego Harbor \$536,172.27 (alt #1) Lathrup Village \$424,379.31 Madison Heights \$313,078.12 Oak Park \$1,400,000 Holly Twp 227,731.05 Rose Twp \$374,763.07 Royal Oak Twp \$468,101.49 Lake Orion \$107,000 Ortonville \$252,000
8	Responsible Organization	Marsha Scheer, CD Dir, City of Ferndale, 300 E 9 Mile Rd, Ferndale, MI 48220-1797; Mark Stec, CDBG Coor, City of Hazel Park, 111 E 9 Mile Rd, Hazel Park, MI 48030-1892; Linda Voll, Clerk, City of Keego Harbor, 2025 Beechmont, Keego Harbor, MI 48320-0665; Gloria Harris-Ford, CD Dir/Clerk, City of Lathrup Vlg, 27400 Southfield Rd, Lathrup Vlg, MI 48076-3489; James T Schafer, CD Dir, City of Madison Hts, 300 W 13 Mile Rd, Madison Heights, MI 48071-1899; Kevin Rulkowski, Planner, City of Oak Park, 13600 Oak Park Blvd, Oak Park, MI 48237-2029; Jesse Lambert, Supv, Twp of Holly, 102 Civic Dr, Holly, MI 48442-1505; David Schang, Bldg Ofc, Twp of Rose, 9080 Mason St, Holly, MI 48442-8587; William Morgan, Supv, Twp of Royal Oak, 21131 Garden Ln 2nd Flr, Ferndale, MI 48220-2122; Paul Zelenak, Mgr, Vlg of Lake Orion, 37 E Flint St, Lake Orion, MI 48362-3274; Ed Coy, Mgr, Vlg of Ortonville, 476 Mill St POB 928, Ortonville, MI 48462-0928
9	Projected Start Date	February 2009
10	Projected End Date	July 2013
11	Specific Activity Requirements a. discount rate b. range of interest rates c. duration or term of assistance; d. tenure of beneficiaries e. ensuring continued affordability	ERR Classification: Categorically Excluded or Environmentally Assessed. a. At least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level b. 0% deferred loans as soft seconds c. May be as long as until the homebuyer sells the home or the home is no longer the homebuyer's principal residence. d. Single Family Owner Occupied Housing Units e. Assistance secured with mortgage/mortgage note and subject to HOME resale/recapture provisions.

**7. ACQUISITION AND DEMOLITION OF BLIGHTED PROPERTIES  
(TOP QUARTILE AREAS OF GREATEST NEED)**

1	Activity Name	Acquisition and Demolition of Blighted Properties
2	Activity Type	NSP: Demolish blighted structures. Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties, CDBG: Acquisition (24 CFR 570.201).
3	National Objective	LMMA (Low/Moderate/Middle Income Area benefit): serves an area in which at least 51% of residents with incomes at or below 120% AMI.
4	Activity Description	Activity Description NSP top quartile areas of greatest need communities (subrecipients) may self administer or contract for the administration of this project with a participating entity (qualified pre-approved developers, both for-profit and non-profit). Acquisition and clearance of blighted properties. Refer to definition of blight in Section C As described in Section E, the clearance of blighted properties is expected to be of substantial benefit to the top quartile areas of greatest need LMMI-neighborhoods in which the properties are located. The cleared properties may be offered for resale at current market price and sold to adjacent property owner(s) to increase substandard lot widths, or sold to any buyer for future development. If the adjacent property owner-occupants are income eligible (120% AMI), the cleared property may be conveyed or donated at less than market rate, for the purpose of increasing the adjacent property's compliance with zoning, building, or fire safety codes and standards. Cleared properties may be retained and redeveloped for CDBG-eligible public uses (such as a tot park, community garden, or expansion of a neighborhood facility). Property may also be conveyed or donated to a Community-Based Development Organization (CBDO) for new LMMI housing construction. Term of assistance and continued affordability requirements (as described in Section C (3)) shall not apply to market rate dispositions of cleared property located in LMMI-eligible areas. All other dispositions shall comply with applicable provisions of Section C (3). The purchase price of the property must reflect at least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level of fifteen percent.
5	Location Description	Oakland County NSP Top Quartile Areas of Greatest Need

Community	CT	BG	Community	CT	BG	Community	CT	BG
Hazel Park	175000	1	Hazel Park	175300	2	Madison Heights	181300	1
Hazel Park	175000	2	Hazel Park	175300	3	Madison Heights	181300	2
Hazel Park	175000	3	Hazel Park	175300	4	Madison Heights	181300	3
Hazel Park	175000	4	Hazel Park	175300	5	Madison Heights	181400	1
Hazel Park	175100	1	Hazel Park	175300	6	Madison Heights	181400	2
Hazel Park	175100	2	Hazel Park	175300	7	Madison Heights	181400	3
Hazel Park	175100	3	Keego Harbor	154200	1	Madison Heights	181400	4
Hazel Park	175100	4	Keego Harbor	154200	2	Madison Heights	181500	1
Hazel Park	175100	5	Keego Harbor	154200	3	Madison Heights	181500	2
Hazel Park	175100	6	Madison Heights	181000	1	Madison Heights	181600	1
Hazel Park	175100	7	Madison Heights	181000	2	Madison Heights	181600	2
Hazel Park	175200	1	Madison Heights	181100	1	Madison Heights	181600	3
Hazel Park	175200	2	Madison Heights	181100	2	Oak Park	171000	1
Hazel Park	175200	3	Madison Heights	181100	3	Oak Park	171000	2
Hazel Park	175200	4	Madison Heights	181100	4	Oak Park	171000	3
Hazel Park	175200	5	Madison Heights	181200	1	Oak Park	171000	4
Hazel Park	175200	6	Madison Heights	181200	2	Oak Park	171000	5
Hazel Park	175300	1	Madison Heights	181200	3	Oak Park	171100	1
			Madison Heights	181200	4	Oak Park	171100	2

Community	CT	BG	Community	CT	BG	Community	CT	BG
Oak Park	171100	3	Oak Park	171400	4	Rose Twp	125600	1
Oak Park	171200	1	Oak Park	171400	5	Rose Twp	125600	2
Oak Park	171200	2	Oak Park	171500	1	Holly Twp	124000	1
Oak Park	171200	3	Oak Park	171500	2	Holly Twp	124000	2
Oak Park	171300	1	Oak Park	171600	1	Holly Twp	124000	3
Oak Park	171300	2	Oak Park	172400	1	Lake Orion Vlg	129000	1
Oak Park	171400	1	Ortonville	122900	1	Lake Orion Vlg	129000	2
Oak Park	171400	2	Rose Twp	125000	1	Lake Orion Vlg	129000	3
Oak Park	171400	3	Rose Twp	125000	2			

6	Performance Measures	Blighted properties cleared all of which will be located in areas where at least 51% of the residents have incomes at or below 120% AMI. <ul style="list-style-type: none"> <li>▪ Hazel Park (4)</li> <li>▪ Oak Park (4)</li> <li>▪ Madison Heights (5)</li> <li>▪ Keego Harbor (2)</li> <li>▪ Ortonville (2)</li> <li>▪ Rose Twp (2)</li> <li>▪ Holly Twp (3)</li> <li>▪ Lake Orion (4)</li> </ul>
7	Total Budget	NSP: \$1,195,792.71 Hazel Park, \$100,000.00 Oak Park \$230,859.79 Madison Heights \$300,000 Keego Harbor \$50,000 Ortonville \$164,932.92 Rose Twp \$150,000 Holly Twp \$200,000 Lake Orion \$317,297.07 (alt #2)
8	Responsible Organization	Mark Stec, CDBG Coord, City of Hazel Park, 111 E 9 Mile Rd, Hazel Park, MI 48030-1892; Kevin Rulkowski, Planner, City of Oak Park, 13600 Oak Park Blvd, Oak Park, MI 48237-2029; James T Schafer, CD Dir, City of Madison Hts, 300 W 13 Mile Rd, Madison Heights, MI 48071-1899; Linda Voll, Clerk, City of Keego Harbor, 2025 Beechmont, Keego Harbor, MI 48320-0665; Ed Coy, Mgr, Vlg of Ortonville, 476 Mill St POB 928, Ortonville, MI 48462-0928; David Schang, Bldg Ofc, Twp of Rose, 9080 Mason St, Holly, MI 48442-8587; Jesse Lambert, Supv, Twp of Holly, 102 Civic Dr, Holly, MI 48442-1505; Paul Zelenak, Mgr, Vlg of Lake Orion, 37 E Flint St, Lake Orion, MI 48362-3274
9	Projected Start Date	February 2009
10	Projected End Date	July 2013
11	Specific Activity Requirements a. discount rate	ERR Classification: Environmentally Assessed. a. At least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level

**8. DEMOLITION OF BLIGHTED STRUCTURES  
(TOP QUARTILE AREAS OF GREATEST NEED)**

1	Activity Name	Demolition of Blighted Structures
2	Activity Type	NSP: Demolition of blighted structures. CDBG: Clearance and remediation activities (24 CFR 570.201)
3	National Objective	LMMA (Low/Moderate/Middle Income Area benefit): serves an area in which at least 51 percent of the residents have incomes at or below 120 percent of area median income.
4	Activity Description	The Subrecipient or a Participating Entity will demolish vacant, blighted properties. These properties will be demolished because they are so blighted that the required investment to bring them up to code and habitable is much greater than the expected sales price of the property. This activity will address all the areas of greatest need. The expected benefit of this activity to low-, moderate- and middle-income households is an area benefit. All properties that are demolished will be located in census tracts in which at least 51% of the residents have incomes at or below 120% of area median income, and the residents of those census tracts will benefit by from the elimination of these vacant, blighted structures, which 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.
5	Location Description	Oakland County NSP Top Quartile Areas of Greatest Need

Community	CT	BG
Royal Oak Twp	172500	1
Royal Oak Twp	172500	2

6	Performance Measures	1 public facility 12 housing units
7	Total Budget	NSP: \$269,000 Royal Oak Township
8	Responsible Organization	William Morgan, Supv, Twp of Royal Oak, 21131 Garden Ln 2nd Flr, Ferndale, MI 48220-2122
9	Projected Start Date	February 2009
10	Projected End Date	July 2013
11	Specific Activity Requirements	ERR Classification: Environmentally Assessed.

## 9. REDEVELOPMENT

1	Activity Name	Redevelopment
2	Activity Type	NSP: Demolish blighted structures and redevelop demolished or vacant properties; CDBG: 24 CFR 570.201(a) Acquisition; 24 CFR 570.201(b) Disposition; 24CFR 570.201(d) Clearance for blighted structures only; 24 CFR 570.201(c) public facilities and improvements, Construction of housing 24 CFR 570.201
3	National Objective	National Objective: 24 CFR 570.208(a) (2) Limited clientele activity benefiting low and moderate income persons (up to 120% of MFI permitted under NSP); there is potential for area wide benefit under 24 CFR 570.208(a) (1) at the discretion of HUD, LMMH (Low/Moderate/Middle Income Housing benefit): provides or improves permanent residential structures that will be occupied by a household whose income is at or below 120 percent of area median income.
4	Activity Description	Activity Description This activity will allow the demolition of blighted structures and redevelopment of demolished or vacant properties. The specific neighborhoods within the areas of greatest need will be identified at the time the NSP funds are available for drawdown and as the program progresses. Properties under this activity may be redeveloped with housing or, if allowed by HUD, redeveloped with public facilities to serve either a limited clientele or low to moderate income persons on an area wide basis. NSP funds may be used to construct new housing on some parcels of land where a vacant, blighted, foreclosed property was demolished. After demolishing a blighted structure and clearing the property, the subrecipient may assign the property to a pre-approved participating entity (qualified developer) to construct a new home on the site. The benefit to low- moderate- and middle-income households will be a housing benefit, and all of the homes built will be sold to households making no more than 120% AMI. This activity will address all the areas of greatest need and will be used to meet the requirement that 25% of the NSP funds be used to assist households making no more than 50% AMI, though some of the homebuyers assisted through this activity may have higher incomes. Resale or transfer of cleared property to income eligible owner-occupant households of adjacent property at less than market rate shall be secured by a recorded document. The period of affordability for each assisted homeownership unit will be modeled after the HOME affordability requirements and will be based on the amount of permanent subsidy going to the homebuyer. If a homeowner does receive a permanent subsidy, we expect to impose a lien to ensure compliance with the applicable affordability requirements. All homebuyers receiving assistance through this activity will receive the NSP-required eight hours of homebuyer counseling.
5	Location Description	Oakland County NSP Top Quartile Areas of Greatest Need



Community	CT	BG	Community	CT	BG	Community	CT	BG
Hazel Park	175000	1	Hazel Park	175300	2	Madison Heights	181200	3
Hazel Park	175000	2	Hazel Park	175300	3	Madison Heights	181200	4
Hazel Park	175000	3	Hazel Park	175300	4	Madison Heights	181300	1
Hazel Park	175000	4	Hazel Park	175300	5	Madison Heights	181300	2
Hazel Park	175100	1	Hazel Park	175300	6	Madison Heights	181300	3
Hazel Park	175100	2	Hazel Park	175300	7	Madison Heights	181300	4
Hazel Park	175100	3	Keego Harbor	154200	1	Madison Heights	181400	1
Hazel Park	175100	4	Keego Harbor	154200	2	Madison Heights	181400	2
Hazel Park	175100	5	Keego Harbor	154200	3	Madison Heights	181400	3
Hazel Park	175100	6	Royal Oak Twp	172500	1	Madison Heights	181400	4
Hazel Park	175100	7	Royal Oak Twp	172500	2	Madison Heights	181500	1
Hazel Park	175200	1	Madison Heights	181000	1	Madison Heights	181500	2
Hazel Park	175200	2	Madison Heights	181000	2	Madison Heights	181600	1
Hazel Park	175200	3	Madison Heights	181100	1	Madison Heights	181600	2
Hazel Park	175200	4	Madison Heights	181100	2	Madison Heights	181600	3
Hazel Park	175200	5	Madison Heights	181100	3	Lake Orion Vlg	129000	1
Hazel Park	175200	6	Madison Heights	181100	4	Lake Orion Vlg	129000	2
Hazel Park	175300	1	Madison Heights	181200	1	Lake Orion Vlg	129000	3
			Madison Heights	181200	2			

6	Performance Measures	<p>Single Family Owner Occupied Housing Units</p> <ul style="list-style-type: none"> <li>▪ 50% AMI or Less <ul style="list-style-type: none"> <li>1 Hazel Park    2 Royal Oak Township</li> <li>3 Keego Harbor   1 Madison Heights</li> </ul> </li> <li>▪ 51-80% AMI <ul style="list-style-type: none"> <li>2 Hazel Park    3 Keego Harbor</li> <li>2 Madison Heights</li> </ul> </li> <li>▪ 81-120% AMI <ul style="list-style-type: none"> <li>3 Hazel Park    3 Keego Harbor</li> <li>2 Madison Heights</li> </ul> </li> </ul> <p>Public Facility</p> <ul style="list-style-type: none"> <li>▪ Hazel Park (3)</li> <li>▪ Madison Heights, (1)</li> <li>▪ Lake Orion Village (1)</li> </ul>
7	Total Budget	<p>NSP: \$1,865,375.07 Leveraging to be determined.</p> <p>\$720,000 Hazel Park (construct 6 new housing units)</p> <p>\$200,000 Royal Oak Twp (demolish 12 existing blighted structures and construct 2 new housing units)</p> <p>\$78,078 Hazel Park (acquire, demolish and redevelop into 3 public facilities)</p> <p>\$536,172.27 Keego Harbor (acquire, demolish and construct 9 new housing units) (alt #2)</p> <p>\$550,000 Madison Heights (acquire, demolish and redevelop into 1 public facility)</p> <p>\$317,297.07 Lake Orion (acquire, demolish and redevelop 1 public facility) (alt #1)</p> <p>If it is determined that demolition and/or redevelopment would be a beneficial use of additional NSP funds, NSP funds will be transferred to this activity from another activity. Such re-assignment of funds shall not be considered a Substantial Amendment to the Action Plan.</p>
8	Responsible Organization	<p>Mark Stec, CDBG Coord, City of Hazel Park, 111 E 9 Mile Rd, Hazel Park, MI 48030-1892; William Morgan, Supv, Twp of Royal Oak, 21131 Garden Ln 2nd Flr, Ferndale, MI 48220-2122 ; James T Schafer, CD Dir, City of Madison Hts, 300 W 13 Mile Rd, Madison Heights, MI 48071-1899; Paul Zelenak, Mgr, Vlg of Lake Orion, 37 E Flint St, Lake Orion, MI 48362-3274</p>
9	Projected Start Date	February 2009
10	Projected End Date	July 2013
11	Specific Activity Requirements	<p>ERR Classification: Environmentally Assessed</p> <ul style="list-style-type: none"> <li>a. At least 5% less than current market appraised value and as high as required to keep the total NSP portfolio within the required purchase discount level</li> <li>b. 0% deferred loans as soft seconds</li> <li>c. May be as long as until the homebuyer sells the home or the home is no longer the homebuyer's principal residence.</li> <li>d. Single Family Owner Occupied Housing Units</li> <li>e. Assistance secured with mortgage/mortgage note and subject to HOME resale/recapture provisions.</li> </ul>