

**PROPOSED**  
**ST. CLAIR COUNTY NSP3 ACTION PLAN**  
**APPLICATION FOR NSP3 FUNDS**

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<b><u>Jurisdiction Web Address:</u></b> <a href="http://www.stclaircounty.org">http://www.stclaircounty.org</a> (URL where Action Plan materials are posted)	

**OVERVIEW:**

St. Clair County anticipates receiving \$1,129,355 in NSP3 funds from the federal government. NSP3 is round three of the Neighborhood Stabilization Program, administered by the U.S. Department of Housing and Urban Development (HUD).

Funding for NSP3 is provided under the Dodd-Frank Act of 2010. NSP3 funds are considered Community Development Block Grant (CDBG) funds and, unless specifically addressed by statute, all of the rules and regulations covering CDBG apply to NSP3.

These funds are provided to provide targeted emergency assistance to state and local governments to stabilize neighborhoods through the acquisition, redevelopment, or demolition of vacant or foreclosed and abandoned properties. Because of the overwhelming need and the limited amount of available funding, NSP3 requires the county to target funds to neighborhoods whose viability have been threatened by the risk of foreclosure, high vacancy rates, and the prevalence of subprime mortgages. To assist the county in identifying target areas, HUD has provided data that must be used to assess neighborhood need and the estimated number of properties to make an impact. St. Clair County has identified three target areas that will be eligible for NSP3 activities: Port Huron A, Port Huron B, and Marine City. Further details about these target areas can be found below, under “NSP3 Target Areas.”

Households occupying NSP3-assisted properties must have incomes less than or equal to 120% of the Area Median Income (AMI). In addition, 25% of all NSP3 funds must be spent on housing for households whose income does not exceed 50% of AMI. Table 3 contains a schedule showing NSP3 income data.

For the purpose of administering NSP3 funds, eligible households are divided into three income groups as follows:

- Low Income (Low)  $\leq$  50% AMI
- Moderate Income (Mod)  $>$  50% AMI and  $\leq$  80% AMI
- Middle Income (Mid)  $>$  80% AMI and  $\leq$  120% AMI

**LOW INCOME TARGETING:**

In compliance with the NSP3 requirement that 25% of the NSP3 funds must be expended to produce housing that will benefit households whose income does not exceed 50% AMI (low income), St. Clair County is allocating a minimum of \$282,339 to activities benefiting such

households. These funds will be used by Blue Water Habitat for Humanity to rehabilitate four vacant or foreclosed single family homes for resale to low income households. Additionally, it is expected at least four homebuyers receiving NSP3 rehabilitation assistance under activity NSP3-4 will be a low-income household with a household income at or below 50% AMI.

## **DEFINITIONS FOR NSP3:**

**Abandoned:** A home or residential property is abandoned if either (a) mortgage, tribal leasehold, or tax payments are at least 90 days delinquent, or (b) a code enforcement inspection has determined that the property is not habitable and the owner has taken no corrective actions within 90 days of notification of the deficiencies, or (c) the property is subject to a court-ordered receivership or nuisance abatement related to abandonment pursuant to state or local law or otherwise meets a state definition of an abandoned home or residential property.

**Blighted Structure:** A structure is blighted when it exhibits objectively determinable signs of deterioration sufficient to constitute a threat to human health, safety, and public welfare. More specifically, a structure is blighted if it exhibits one or more of the causes of blight or blighting factors as defined in Section 22-52 of the City of Port Huron Blight Ordinance, effective May 15, 2010. *Demolition of blighted structures (Activity NSP3-1) will only be carried out in Port Huron target area.*

**Current Market Appraised Value:** The current market appraised value means the value of a foreclosed upon home or residential property that is established through an appraisal made in conformity with either (1) The appraisal requirements of the Uniform Relocation Act (URA) at 49 CFR 24.103, or (2) the Uniform Standards of Professional Appraisal Practice (USPAP), or (3) the appraisal requirements of the Federal Housing Administration (FHA) or a government sponsored enterprise (GSE); and the appraisal must be completed or updated within 60 days of a final offer made for the property by a grantee, subrecipient, developer, or homebuyer. However, if the anticipated value of the proposed acquisition is estimated at \$25,000 or less, the current market appraised value of the property may be established by a valuation of the property that is based on a review of available data and is made by a person the grantee determines is qualified to make the valuation.

**Foreclosed:** A home or residential property “has been foreclosed upon” if any of the following conditions apply: (a) The property’s current delinquency status is at least 60 days delinquent under the Mortgage Bankers of America delinquency calculation and the owner has been notified; (b) the property owner is 90 days or more delinquent on tax payments; (c) under state, local, or tribal law, foreclosure proceedings have been initiated or completed; or (d) foreclosure proceedings have been completed and title has been transferred to an intermediary aggregator or servicer that is not an NSP grantee, contractor, subrecipient, developer, or end user.

## **ACQUISITION AND RELOCATION:**

No relocation of tenants will result from any activity included in the St. Clair County NSP3 Action Plan. Only single family homes that are vacant, abandoned or foreclosed and currently have no tenants will be eligible for acquisition and/or rehabilitation through the NSP3 program.

<b>TABLE 1: SUMMARY OF PROPOSED NSP3 ACTIVITIES</b>				
<b>Activity No.</b>	<b>Activity Title/ Description</b>	<b>Proposed Allocation</b>	<b>Accomplishments/ Beneficiaries/ Location</b>	<b>Anticipated Start/ Completion Date</b>
NSP3-1	<b>Demolition of blighted residential structures.</b> City of Port Huron will demolish blighted residential structures.	\$100,000 from NSP3 grant funds	8 blighted residential structures. All will be in Port Huron target area.	04-01-2011/ 03-31-2014
NSP3-2	<b>Acquisition/Rehabilitation/Resale.</b> County will provide grant funds to nonprofit developers for acquisition of foreclosed or abandoned homes. Homes will be rehabilitated and resold to NSP3-eligible households. Down payment and closing cost assistance will be paid with proceeds from. Program income will be used to do additional rehab/resale projects.	\$300,000 from NSP3 grant funds  \$150,000 estimated program income	3 homes in Port Huron target area, serving mod- and mid-income households.  Potentially 2 additional homes from program income.	04-01-2011/ 03-31-2014
NSP3-3	<b>Rehabilitation/Resale.</b> County will provide grant funds to Blue Water Habitat for Humanity and/or the SCC Land Bank Authority for the rehabilitation of vacant or foreclosed homes in Marine City and Port Huron target areas. The homes will be rehabilitated and then sold to NSP3-eligible households for permanent occupancy.	\$225,000 from NSP3 grant funds  <i>(\$180,000 for HH at or below 50% AMI)</i>  \$150,000 estimated program income	5 homes in NSP3 target areas. 4 units will serve low-income households at or below 50% AMI. 1 vacant unit will be rehabbed by the SCC Land Bank Authority & serve households at or below 120% AMI. Potential for 3 additional homes through program income.	04-01-2011/ 03-31-2014
NSP3-4	<b>Rehabilitation Assistance.</b> City of Port Huron will utilize HOME funds to provide up to \$6,000 down payment assistance and County will provide up to \$25,000 per unit for rehabilitation to NSP-eligible homebuyers purchasing a foreclosed home in the Port Huron target area.	\$391,420 from NSP3 grant funds  <i>(\$102,339 for HH at or below 50% AMI)</i>	15 homes purchased by NSP-eligible households will be rehabilitated. 4 homes will serve low-income households at or below 50% AMI. 11 homes will serve mod- and mid-income households	04-01-2011/ 03-31-2014
NSP3-5	<b>NSP3 Administration (Grant allocation and Estimated Program Income)</b> County and City of Port Huron will enter into subrecipient agreement for city to administer grant program for County. City to receive 70% of admin funds/County to receive 30% of admin funds.	\$112,935 from NSP3 grant funds  \$30,000 estimated program income	NA	NA
Total	<b>Total NSP3 Grant Allocation</b>	<b>\$1,129,355</b>	<i>(Total NSP3 Revenue = NSP3 Grant Allocation + Estimated Program Income)</i>	
	<b>Total Estimated Program Income</b>	<b>\$300,000</b>		
	<b>Total NSP3 Revenue</b>	<b>\$1,429,355</b>		

## NSP3 TARGET AREAS:

The NSP3 target areas identified by St. Clair County are (see maps in Appendix):

- **Port Huron A:** Bound by Garfield Street at the north; Pine Grove Avenue/St. Clair River/Merchant Street on the east; Glenwood Street at the south; and the Black River/12<sup>th</sup> Avenue to the west.

The Port Huron A target area has an NSP3 (need) score of **18.23** out of 20. HUD has estimated that the number of abandoned, vacant or foreclosed properties that must be addressed either through demolition or rehabilitation and reoccupancy to have an impact is 13.

- **Port Huron B:** Bound by the Black River at the north; Military Street at the east; Ravenswood at the south; and then jogging from 32<sup>nd</sup> Street to Cleveland Avenue and up 16<sup>th</sup> Street to Bancroft Street, and finally up 24<sup>th</sup> Street and 17<sup>th</sup> Street at the west.

The Port Huron B target area has an NSP3 (need) score of **18.76** out of 20. HUD has estimated that the number of abandoned, vacant or foreclosed properties that must be addressed either through demolition or rehabilitation and reoccupancy to have an impact is 37.

- **Marine City:** Bound by Woodworth, North Belle River, and Metropolis Streets at the north; down South River Road to Robertson and over to King Road at the west; Chartier Rd at the south; and the St. Clair River to the east.

The Marine City target area has an NSP3 (need) score of **19** out of 20. HUD has estimated that the number of abandoned, vacant or foreclosed properties that must be addressed either through demolition or rehabilitation and reoccupancy to have an impact is 10.

In addition to meeting HUD's target neighborhood requirements, these areas were selected because they are the county's areas of greatest need and because the investment of NSP3 funds will build on the investment of other resources in these areas, including NSP1 projects, CDBG programs, HOME programs, and other public/nonprofit activities.

## DODD-FRANK ACT RENTAL PREFERENCE:

The Dodd-Frank Act of 2010, which provides the funding for NSP3, includes a preference for affordable rental housing if appropriate for NSP3 target areas. *St. Clair County has determined that the development of rental housing in the NSP3 target areas will not be an effective use of funds within the targeted neighborhoods.* The local jurisdictions are currently trying to increase homeownership within their communities due to very high levels of renter-occupied housing which is impacting community character and housing values in the neighborhoods. Currently, the City of Port Huron estimates that nearly 50% of the city's housing units are renter-occupied units. The City of Marine City is 26% renter-occupied. As such, the county's NSP3 program seeks to increase opportunities for permanent, owner-occupied housing in the NSP3 target areas.

## NSP3 PROPOSED ACTIVITIES AND CONTINUED AFFORDABILITY:

### NSP3-1 Demolition of Blighted Residential Structures

<b>Eligible CDBG Activity:</b>	24 CFR 570.201(d) Clearance for blighted structures only.
<b>Eligible NSP3 Activity:</b>	NSP3 Eligible Use D: Demolition
<b>Affect on Local Housing Market Conditions:</b>	Elimination of blighted and dangerous structures within target area will alleviate negative impacts on low-, mod-, and mid- income neighborhoods, resulting in positive benefit for area.
<b>Expected benefit to income-qualified persons , households, or areas:</b>	Following demolition, the vacant lot will be used for redevelopment by the owner, provide desired green space or be divided between income-eligible adjacent property owners.
<b>Vicinity Hiring Preference:</b>	The county and its program partners will give priority procurement preference to responsible bids from contractors/ subcontractors located in NSP3 target areas.
<b>NSP3 Grant Funds Budgeted for Activity:</b>	\$100,000
<b>Potential Program Income:</b>	Not applicable
<b>Performance Measures:</b>	Demolition of 8 blighted residential structures
<b>Expected Start/End Dates:</b>	04/01/2011 – 03/31/2014
<b>Responsible Entity:</b>	City of Port Huron 100 McMorran Blvd. Port Huron, MI 48060 (810) 984-9736

**National Objective:** To stabilize the neighborhoods by eliminating abandoned and vacant buildings that promote blight and devaluation of properties within the targeted area benefitting low, moderate and middle income areas.

**NSP3 Target Area(s):** Port Huron A and Port Huron B

**Activity Description:** The greatest need this activity addresses is the elimination of blighted and dangerous structures within the target neighborhoods. The qualifying demolition will alleviate the negative impact on low-, mod-, and middle-income neighborhoods, resulting in a positive benefit for the area. The vacant lot will be used for redevelopment by the owner, provide desired green space, or be divided between income-eligible adjacent property owners.

In cases where the property has been foreclosed and abandoned and has become a blight issue in the neighborhood, the City of Port Huron, consistent with city ordinances, may demolish the property and place a lien on the property to recover the costs. Priority will be given to tax reverted property owned by the City of Port Huron, the county, or the St. Clair County Land Bank Authority. Privately owned properties may be also be considered for demolition.

Eligible activity costs include:

- In some cases, acquisition of the foreclosed or abandoned property by the City.
- Deconstruction and demolition
- Clearance, removal, and disposition of materials.
- Site restoration (grading, seeding, and curb replacement).

In cases where the city acquires a property with the intent of demolishing the structure, Blue Water Habitat for Humanity will have the opportunity to go into the structure for deconstruction, allowing them to take salvageable building materials and other usable items from the property to

be used on other rehabilitation projects or for sale at the Habitat restore. When possible, demolition and deconstruction activities will be pursued in collaboration with State of Michigan workforce development programs, providing job training for displaced workers and neighborhood residents.

### NSP3-2 Acquisition/Rehabilitation/Resale

<b>Eligible CDBG Activity:</b>	24 CFR 570.201(a) Acquisition; 24 CFR 570.201(b) Disposition; 24 CFR 570.202 eligible rehabilitation and preservation activities for homes
<b>Eligible NSP3 Activity:</b>	NSP3 Eligible Use B: Acquisition and Rehabilitation
<b>Affect on Local Housing Market Conditions:</b>	Elimination of vacant, abandoned, and foreclosed properties from neighborhood blocks; improvement of housing stock to enhance neighborhood character and positive impact on property values; increased homeownership in neighborhood.
<b>Tenure of Beneficiaries:</b>	Owner-Occupied Housing
<b>Expected benefit to income-qualified persons, households, or areas:</b>	Low-, mod-, and mid-income households will have new opportunities for homeownership, housing will be affordable for the long-term, and the surrounding neighborhood benefits from having a newly rehabilitated home that enhances property values.
<b>Vicinity Hiring Preference:</b>	The county and its program partners will give priority procurement preference to responsible bids from contractors/ subcontractors located in NSP3 target areas.
<b>NSP3 Grant Funds Budgeted for Activity:</b>	\$300,000
<b>Potential Program Income:</b>	\$150,000
<b>Performance Measures:</b>	Acquisition & rehabilitation of 3 units in Port Huron target area. Potential for 2 additional units through Program Income.
<b>Expected Start/End Dates:</b>	04/01/2011 – 03/31/2014
<b>Responsible Entity:</b>	City of Port Huron 100 McMorran Blvd. Port Huron, MI 48060 (810) 984-9736

**National Objective:** To assist low, moderate, and middle income households within the community to stabilize neighborhoods suffering from the high rate of foreclosures, vacant and abandoned buildings, and high-cost loan activities.

**NSP3 Target Area(s):** Port Huron target area

**Activity Description:** St. Clair County will provide NSP3 grant funds to nonprofit developers that will use those funds to acquire and rehabilitate foreclosed, vacant, and/or abandoned homes in the Port Huron target area. Once the home is rehabilitated, it will be appraised to determine a fair market value and then sold to an NSP-eligible homebuyer whose household income is at or below 120% AMI. A schedule of NSP income limits can be found in Table 3. The home will be sold at market value or an amount equal to the project cost, whichever is less. The homebuyer must use the home as their primary residence. The City of Port Huron may provide up to \$6,000 in HOME funds for down payment and closing cost assistance, as well as homeownership counseling, to NSP3 homebuyers with a household income of less than or equal to 80% AMI. For NSP3 homebuyers with a household income between 81% and 120% AMI, down payment and closing cost assistance up to \$3,000 may be paid with proceeds from the sale of the home. Buyers must obtain mortgage financing to cover the balance of the purchase. The remaining proceeds from the sale will be returned to St. Clair County as

program income to be used for additional NSP3-eligible activities in the NSP3 target areas. St. Clair County will allocate program income to nonprofit developers on a per project basis. The nonprofit developers involved in this NSP3 activity will be the Community Action Agency of St. Clair County and Blue Water Residential Nonprofit Housing Corporation. After initial NSP3 homes are sold to eligible homebuyers, the program income resulting from those sales will be used for additional NSP3 eligible activities.

**Continued Affordability:** To ensure the continued affordability of the NSP3-assisted home, the amount of the NSP3 and HOME funds provided for down payment and closing cost assistance will be a loan subject to recapture during a five-year affordability period. The loan will be secured by a second lien on the property purchased and payments on the loan will be deferred and the loan will be forgiven on the fifth anniversary at the end of the affordability period. If the homebuyer sells the home or ceases to use it as a principal residence during the affordability period, the NSP3 funds will be recaptured. The recaptured funds will be used for additional NSP3 eligible activities.

### NSP3-3 Rehabilitation/Resale

<b>Eligible CDBG Activity:</b>	24 CFR 570.202 eligible rehabilitation and preservation activities for homes and other residential properties.
<b>Eligible NSP3 Activity:</b>	Eligible Use B: Acquisition & Rehabilitation;
<b>Affect on Local Housing Market Conditions:</b>	Elimination of vacant, abandoned, and foreclosed properties from neighborhood blocks; improvement of housing stock to enhance neighborhood character and positive impact on property values; increased homeownership in neighborhood.
<b>Tenure of Beneficiaries:</b>	Owner-occupied Housing
<b>Expected benefit to income-qualified persons, households, or areas:</b>	Low-, mod-, & middle-income households will have new opportunities for homeownership, housing will be affordable for long-term, and the surrounding neighborhood benefits from improvements.
<b>Vicinity Hiring Preference:</b>	Blue Water Habitat for Humanity will serve as the primary contractor for rehabilitation activities; when applicable, Habitat will utilize the services of subcontractors from the target area or the target area jurisdiction. The SCC Land Bank Authority will follow vicinity hiring preference requirements for
<b>NSP3 Grant Funds Budgeted for Activity:</b>	\$225,000
<b>Potential Program Income:</b>	\$150,000
<b>Performance Measures:</b>	5 homes in NSP3 target areas. 4 of these units will serve low-income households at or below 50% AMI. 1 vacant unit will be rehabbed by the SCC Land Bank Authority and sold to an eligible household at or below 120% AMI. Potential for 3 additional homes through program income.
<b>Expected Start/End Dates:</b>	04/01/2011 – 03/31/2014
<b>Responsible Entity:</b>	Blue Water Habitat for Humanity, 1228 6 <sup>th</sup> St., Port Huron, MI 48060 810-985-9080.  St. Clair County Land Bank Authority, c/o 200 Grand River Avenue, Suite 202, Port Huron, MI 48060. 810-989-6950

**National Objective:** To assist low-, mod-, and middle-income households within the community to stabilize neighborhoods suffering from the high rate of foreclosures, vacant and abandoned buildings, and high-cost loan activities

**NSP3 Target Area(s):** Marine City and Port Huron target areas

**Activity Description:** St. Clair County will provide NSP3 grant funds for the rehabilitation of foreclosed, vacant and/or abandoned homes acquired by Blue Water Habitat for Humanity and/or the St. Clair County Land Bank Authority in the Marine City and Port Huron target areas. The county will allocate up to \$45,000 per unit for rehabilitation. Once the home is rehabilitated, it will be appraised to determine a fair market value and then sold to an eligible homebuyer. Four Habitat for Humanity units will be rehabbed and sold to low-income households with a household income at or below 50% AMI. The St. Clair County Land Bank Authority will rehabilitate a vacant home in the Marine City target area and then sell the home to an NSP3-eligible homebuyer with a household income at or below 120% AMI.

**Continued Affordability:** In the case of Blue Water Habitat for Humanity homes, each homebuyer agrees that, in the event they desire to sell the property at any time prior to the satisfaction or termination of the mortgage instrument and its underlying note, the homebuyer must first offer to sell the property to Habitat pursuant to the terms detailed in the mortgage instrument. Habitat has the right of first refusal. The purchase price for the property when offered to Habitat shall be the sum of all principal payments pursuant to the note. If the purchase option/right of first refusal is exercised thereafter, the purchase price shall be equal to the current value of the property. However, the amount paid shall be reduced by any amounts owing to Habitat (1) as repayment of the Principal Reduction Amount, (2) as remaining debt owed under the note, and (3) through the application of Paragraph 3(D) of the note pertaining to the allocation of gifted equity.

In the event that HOME and/or NSP3 funds are used for down payment and closing cost assistance for a Habitat or Land Bank Authority home, that combined amount will be a loan subject to recapture during a five-year affordability period. The loan will be secured by a second lien on the property purchased and payments on the loan will be deferred and the loan will be forgiven on the fifth anniversary at the end of the affordability period. If the homebuyer sells the home or ceases to use it as a principal residence during the affordability period, the NSP3 funds will be recaptured. The recaptured funds will be used for additional NSP3 eligible activities.

**NSP3-4 Rehabilitation Assistance – Consumer Driven**

<b>Eligible CDBG Activity:</b>	24 CFR 570.202 eligible rehabilitation and preservation activities for homes
<b>Eligible NSP3 Activity:</b>	NSP3 Eligible Uses B: Acquisition and Rehabilitation
<b>Affect on Local Housing Market Conditions:</b>	Elimination of vacant, abandoned, and foreclosed properties from neighborhood blocks; improvement of housing stock to enhance neighborhood character and positive impact on property values; increased homeownership in neighborhood.
<b>Tenure of Beneficiaries:</b>	Owner-occupied Housing
<b>Expected benefit to income-qualified persons, households, or areas:</b>	Low-, mod-, and mid-income households will have new opportunities for homeownership, housing will be affordable for the long-term, and the surrounding neighborhood benefits from having a newly rehabilitated home that enhances property values.
<b>Vicinity Hiring Preference:</b>	The county and its program partners will encourage NSP3-homebuyers to give preference to responsible bids from contractors/subcontractors located in NSP3 target areas.
<b>NSP3 Grant Funds Budgeted for Activity:</b>	\$391,420

<b>Potential Program Income:</b>	NA
<b>Performance Measures:</b>	15 homes purchased by NSP3-eligible buyers will be rehabilitated. 4 of those units will target eligible buyers whose household incomes are at or below 50% AMI. The remaining 12 units will be targeted at buyers with household incomes at or below 120% AMI.
<b>Expected Start/End Dates:</b>	04/01/2011 – 03/31/2014
<b>Responsible Entity:</b>	City of Port Huron 100 McMorran Blvd. Port Huron, MI 48060 (810) 984-9736

**National Objective:** To assist low, moderate, and middle income households within the community to stabilize neighborhoods suffering from the high rate of foreclosures, vacant and abandoned buildings, and high-cost loan activities.

**NSP3 Target Area(s):** Port Huron target area

**Activity Description:** St. Clair County will provide up to \$25,000 in NSP3 funding per unit to assist NSP3-eligible homebuyers in acquiring and rehabilitating a foreclosed, vacant and/or abandoned home that they are purchasing in the Port Huron target areas. NSP3-eligible homebuyers whose household income is at or below 120% AMI will identify a foreclosed or abandoned home in the NSP3 target area and obtain mortgage financing to purchase the home. NSP3 funds will be used to rehabilitate the home for the homebuyer. A buyer of an NSP3 home under this activity with a household income at or below 80% AMI may qualify for up to \$6,000 in down payment and closing accost assistance, as well as homeownership counseling and a home inspection from the City of Port Huron’s HOME program. Homebuyers with a household income between 81% and 120% AMI may qualify for \$3,000 in down payment and closing cost assistance, which would reduce the amount of funds available to them for rehabilitation. The maximum amount of NSP3 funds that will be provided to any NSP3-eligible homebuyer under this activity is \$25,000. For example, if a homebuyer has a household income at 90% AMI, he could potentially receive \$3,000 in NSP3 down payment assistance and \$22,000 in rehabilitation assistance. However, if no NSP3 funds are used for down payment assistance, that homebuyer could receive a maximum of \$25,000 for rehabilitation.

**Continued Affordability:** To ensure the continued affordability of the NSP3 assisted home, the amount of NSP3 funds provided for down payment and closing cost assistance will be a loan subject to recapture during a five-year affordability period. If the NSP3-assisted homebuyer also receives assistance from the city’s HOME funds (for down payment assistance, closing cost assistance, home inspection assistance, and/or homeownership counseling), the amount of HOME assistance will be combined with the NSP3 assistance. The loan will be secured by a second lien on the property purchased and payments on the loan will be deferred and the loan will be forgiven on the fifth anniversary at the end of the affordability period. If the homebuyer sells the home or ceases to use it as a principal residence during the affordability period, the NSP3 funds will be recaptured. The recaptured funds will be used for additional NSP3 eligible activities.

### **NSP3-5 NSP3 Administration**

The City of Port Huron will be a program partner and subrecipient of the St. Clair County NSP3 program. Under this partnership, the city will administer the program on behalf of the county and manage projects in HUD’s DRGR tracking system. The city will coordinate projects with

potential NSP-homebuyers, general contractors, subcontractors, and local units of government. County staff will also provide grant oversight and DRGR system monitoring, including financial management by the county's Grants Accountant. The total amount of administration dollars using NSP3 funds will be 10% of the grant allocation, or \$112,935. St. Clair County and the City of Port Huron will enter into a subrecipient agreement and both entities will receive funds for administration of the grant program. It is estimated that an additional \$30,000 in administration funds will be available through program income.

**AMOUNT OF DIRECT ASSISTANCE:**

The amount of direct assistance that will be provided to a homebuyer is also subject to restrictions that may be imposed by the homebuyer's lender. Some buyers may also receive HOME funded down payment assistance from the City of Port Huron. The affordability period for buyers receiving both NSP3 and HOME funded assistance will be based on the total amount of assistance received and determined according to the schedule in Table 2.

**NSP3 HOUSING REHABILITATION STANDARDS:**

At a minimum, all homes receiving rehabilitation assistance will be brought into compliance with applicable local codes in the Port Huron and Marine City communities. Lead Based Paint hazards will be addressed in compliance with HUD regulations. Obsolete products, systems, and appliances (i.e. windows, doors, lighting, hot water heaters, furnaces, boilers, refrigerators, dishwashers, stoves, and clothes washers/dryers) will be replaced with Energy Star-46 labeled products. Water efficient toilets, showers, and faucets will be installed at each rehabilitation project. St. Clair County will encourage its program partners and developers to employ energy efficient and environmentally-friendly green elements in rehabilitation projects as appropriate.

**AFFORDABILITY PERIOD AND RECAPTURE SCHEDULE**

To ensure the continued affordability of the NSP3-assisted home, the amount of NSP3 and/or HOME funds provided for down payment and closing costs assistance will be a loan subject to recapture during an affordability period that is based on the total amount of assistance provided. Table 2 contains the affordability and recapture schedule based on the amount of combined NSP3 and HOME funded assistance. The loan will be secured by a second lien on the property purchased and payments on the loan will be deferred and the loan will be forgiven on the applicable anniversary date at the expiration of the affordability period. If the homebuyer sells the home or ceases to use it as a principal residence during the affordability period, the NSP3 funds will be recaptured. The recaptured funds will be used for additional NSP3-eligible activities. More specific details on continued affordability are provided in the description of each proposed NSP3 activity.

<b>TABLE 2: AFFORDABILITY PERIOD FOR HOMEOWNERSHIP UNITS</b>	
<i>Amount of Combined NSP3 and HOME Funded Assistance</i>	<i>Affordability Period</i>
Less than \$15,000	5 years
\$15,000 - \$40,000	10 years
Greater than \$40,000	15 years

## NSP3 INCOME LIMITS:

Households occupying NSP3-assisted properties must have incomes less than or equal to 120% of the Area Median Income (AMI). In addition, 25% of all NSP3 funds must be spent on housing for households whose income does not exceed 50% of AMI. Table 3 contains a schedule showing NSP3 income data.

	<b>1 Person Household</b>	<b>2 Person Household</b>	<b>3 Person Household</b>	<b>4 Person Household</b>	<b>5 Person Household</b>	<b>6 Person Household</b>
<b>50% AMI</b>	\$24,450	\$27,950	\$31,450	\$34,950	\$37,750	\$40,550
<b>80% AMI</b>	\$39,150	\$44,750	\$50,350	\$55,900	\$60,400	\$64,850
<b>100% AMI</b>	\$48,900	\$55,900	\$62,900	\$69,900	\$75,500	\$81,100
<b>120% AMI</b>	<b>\$58,700</b>	<b>\$67,100</b>	<b>\$75,500</b>	<b>\$83,900</b>	<b>\$90,600</b>	<b>\$97,300</b>

## PUBLIC COMMENT:

This Draft NSP3 Action Plan has been published on the county's website and made available for public review at the offices of the St. Clair County Metropolitan Planning Commission. Written comments can be submitted during a 15-day period extending from February 10, 2011 through February 24, 2011 to the St. Clair County Metropolitan Planning Commission, 200 Grand River Avenue, Suite 202, Port Huron, MI 48060.

The NSP3 Action Plan will be finalized taking into account any comments submitted in writing prior to 4:30 p.m., February 24, 2011. The Action Plan will be presented to the St. Clair County Board of Commissioners for adoption on February 16, 2011. The adopted NSP3 Action Plan and a summary of all comments received prior to the February 24 deadline will be submitted to HUD for final acceptance. The NSP3 funds will be available for expenditure after the Action Plan is accepted by HUD.

## CERTIFICATIONS:

- 1. Affirmatively furthering fair housing.** St. Clair County certifies that it will affirmatively further fair housing.
- 2. Anti-displacement and relocation plan.** St. Clair County certifies that it has in effect and is following a residential anti-displacement and relocation plan.
- 3. Anti-lobbying.** St. Clair County will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- 4. Authority of jurisdiction.** St. Clair County possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- 5. Consistency with plan.** St. Clair County certifies that the housing activities to be undertaken with NSP3 funds are consistent with its consolidated plan or abbreviated plan, as applicable.
- 6. Acquisition and relocation.** The jurisdiction certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property

Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the notice for the NSP program published by HUD.

7. **Section 3.** St. Clair County certifies that it will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations of 24 CFR part 135.
8. **Citizen participation.** St. Clair County certifies that it is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
9. **Use of funds.** St. Clair County certifies that it will comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act and Title XII of Division A of the American Recovery and Reinvestment Act of 2009 by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.
10. **St. Clair County certifies:**
  - a. that all of the NSP3 funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of the area median income; and
  - b. that St. Clair County will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP3 funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP3 funds if the county certifies that it lacks NSP3 or CDBG funds to cover the assessment.
11. **Excessive force.** St. Clair County certifies that it has adopted and is enforcing:
  - a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
  - b. A policy of enforcing applicable state and local laws against physically barring entrance to, or exit from, a facility or location that is subject of such nonviolent civil rights demonstrations within its jurisdictions.
12. **Compliance with anti-discrimination laws.** St. Clair County certifies that the NSP3 grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.
13. **Compliance with lead-based paint procedures.** St. Clair County certifies that its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.
14. **Compliance with laws.** St. Clair County certifies that it will comply with applicable laws.

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

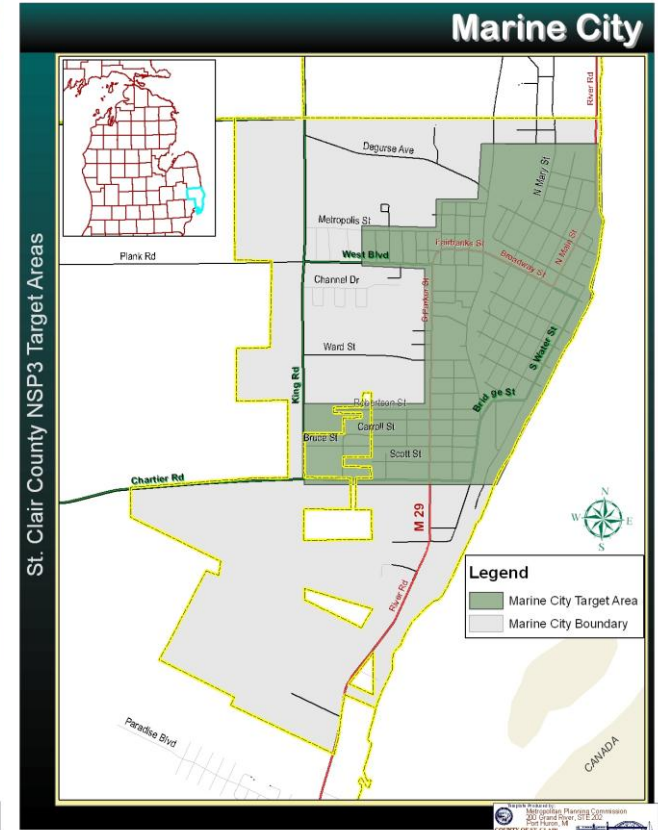
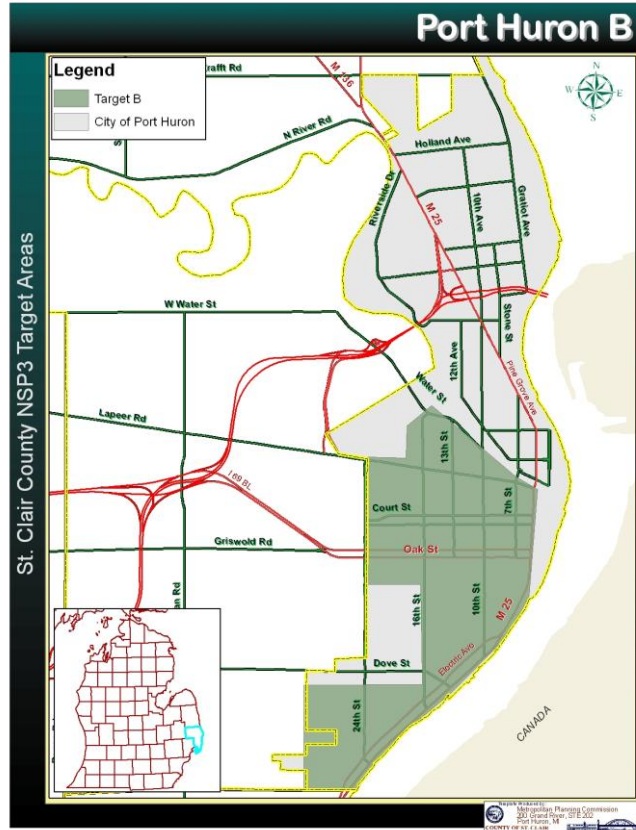
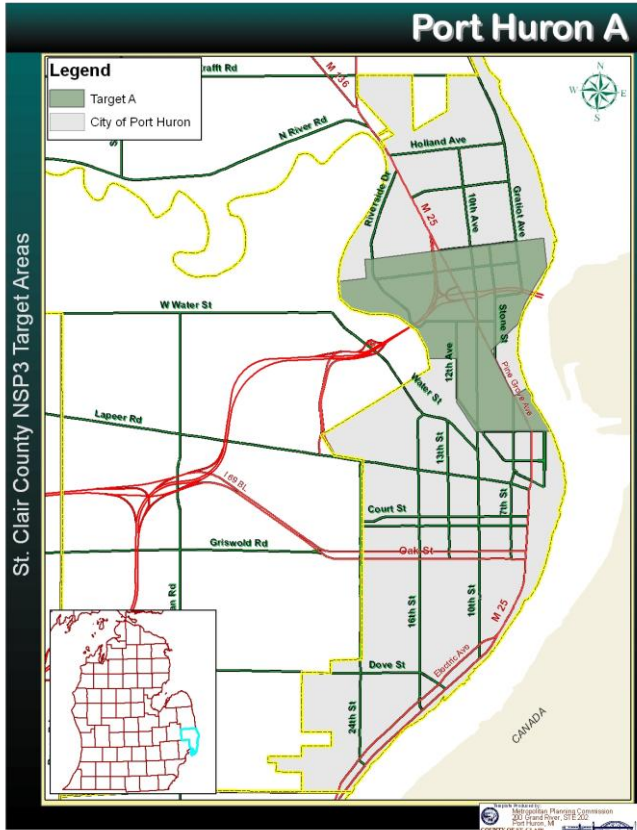
**16. Development of affordable rental housing.** St. Clair County certifies that it will abide by the procedures defined in its NSP3 Abbreviated Plan to create preferences for the development of affordable rental housing for properties assisted with NSP3 funds.

\_\_\_\_\_  
Signature/Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

# ST. CLAIR COUNTY NSP3 TARGET AREA MAPS



Neighborhood ID: 3449127

### **NSP3 Planning Data**

Grantee ID: 2614700C

Grantee State: MI

Grantee Name: ST. CLAIR COUNTY

Grantee Address: 200 Grand River Ave, Suite 202 Port Huron MI 48060

Grantee Email: dstruck@stclaircounty.org

Neighborhood Name: Port Huron A

Date:2011-01-31 00:00:00

#### NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 18.23

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 2934

#### Area Benefit Eligibility

Percent Persons Less than 120% AMI: 83.96

Percent Persons Less than 80% AMI: 63.44

#### Neighborhood Attributes (Estimates)

##### *Vacancy Estimate*

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 2941

Residential Addresses Vacant 90 or more days (USPS, March 2010): 123

Residential Addresses NoStat (USPS, March 2010): 19

### *Foreclosure Estimates*

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 834

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 27.26

Percent of Housing Units 90 or more days delinquent or in foreclosure: 15.85

Number of Foreclosure Starts in past year: 68

Number of Housing Units Real Estate Owned July 2009 to June 2010: 58

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 13

### Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -31.1

Place (if place over 20,000) or county unemployment rate June 2005\*: 10.9

Place (if place over 20,000) or county unemployment rate June 2010\*: 20.4

\*Bureau of Labor Statistics Local Area Unemployment Statistics

### Market Analysis:

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

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

### Latitude and Longitude of corner points

-82.423790 43.006185 -82.452972 43.002701 -82.452629 43.000285 -82.457006 43.000034 -82.457006  
42.999186 -82.456491 42.997742 -82.455289 42.996832 -82.454088 42.996330 -82.452800 42.996204  
-82.449195 42.996267 -82.445247 42.994886 -82.441728 42.990554 -82.437651 42.990680 -82.437265  
42.985092 -82.434475 42.981921 -82.421257 42.982109 -82.425292 42.987352 -82.427695 42.986693  
-82.431815 42.992281 -82.427266 42.995514 -82.425463 42.998653 -82.423017 43.002231

Blocks Comprising Target Neighborhood



Neighborhood ID: 5793609

### **NSP3 Planning Data**

Grantee ID: 2614700C

Grantee State: MI

Grantee Name: ST. CLAIR COUNTY

Grantee Address: 200 Grand River Ave, Suite 202 Port Huron MI 48060

Grantee Email: dstruck@stclaircounty.org

Neighborhood Name: Port Huron B

Date:2011-01-31 00:00:00

#### NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 18.76

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 7379

#### Area Benefit Eligibility

Percent Persons Less than 120% AMI: 86.81

Percent Persons Less than 80% AMI: 68.36

#### Neighborhood Attributes (Estimates)

##### *Vacancy Estimate*

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 7293

Residential Addresses Vacant 90 or more days (USPS, March 2010): 418

Residential Addresses NoStat (USPS, March 2010): 52

### *Foreclosure Estimates*

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 2001

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 37.01

Percent of Housing Units 90 or more days delinquent or in foreclosure: 17.62

Number of Foreclosure Starts in past year: 181

Number of Housing Units Real Estate Owned July 2009 to June 2010: 155

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 37

### Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -31.1

Place (if place over 20,000) or county unemployment rate June 2005\*: 10.9

Place (if place over 20,000) or county unemployment rate June 2010\*: 20.4

\*Bureau of Labor Statistics Local Area Unemployment Statistics

### Market Analysis:

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

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

### Latitude and Longitude of corner points

-82.424326 42.974762 -82.433596 42.980414 -82.437029 42.984056 -82.442522 42.984307 -82.446127  
42.982172 -82.445612 42.978153 -82.452650 42.978279 -82.452650 42.962327 -82.442865 42.962327  
-82.442522 42.950392 -82.461748 42.950140 -82.461061 42.936946 -82.453508 42.936820 -82.435484  
42.950517 -82.426043 42.959061 -82.424154 42.962201

Blocks Comprising Target Neighborhood



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261476360003022,

Neighborhood ID: 5992462

### **NSP3 Planning Data**

Grantee ID: 2614700C

Grantee State: MI

Grantee Name: ST. CLAIR COUNTY

Grantee Address: 200 Grand River Ave, Suite 202 Port Huron MI 48060

Grantee Email: dstruck@stclaircounty.org

Neighborhood Name: Marine City

Date:2011-01-31 00:00:00

#### NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 19

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 1586

#### Area Benefit Eligibility

Percent Persons Less than 120% AMI: 75.45

Percent Persons Less than 80% AMI: 53.44

#### Neighborhood Attributes (Estimates)

##### *Vacancy Estimate*

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 1529

Residential Addresses Vacant 90 or more days (USPS, March 2010): 28

Residential Addresses NoStat (USPS, March 2010): 12

### *Foreclosure Estimates*

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 515

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 31.7

Percent of Housing Units 90 or more days delinquent or in foreclosure: 16.6

Number of Foreclosure Starts in past year: 45

Number of Housing Units Real Estate Owned July 2009 to June 2010: 38

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 10

### Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -31.1

Place (if place over 20,000) or county unemployment rate June 2005\*: 7.7

Place (if place over 20,000) or county unemployment rate June 2010\*: 14.8

\*Bureau of Labor Statistics Local Area Unemployment Statistics

### Market Analysis:

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

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

### Latitude and Longitude of corner points

-82.489021 42.727060 -82.496917 42.726871 -82.497218 42.724128 -82.500737 42.724065 -82.500694  
42.722615 -82.505801 42.722488 -82.505672 42.720786 -82.505629 42.720313 -82.501123 42.720345  
-82.500823 42.713282 -82.509019 42.713187 -82.508976 42.708993 -82.495630 42.709119 -82.492669  
42.714354 -82.489235 42.719146 -82.489064 42.720817 -82.488763 42.723214

Blocks Comprising Target Neighborhood

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