

**Application for Federal Assistance SF-424**

Version 02

<b>*1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>*2. Type of Application</b> * If Revision, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>*Other (Specify)</b> _____
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<b>3. Date Received:</b>	<b>4. Applicant Identifier:</b>
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<b>5a. Federal Entity Identifier:</b>	<b>*5b. Federal Award Identifier:</b>
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**State Use Only:**

<b>6. Date Received by State:</b>	<b>7. State Application Identifier:</b>
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**8. APPLICANT INFORMATION:**

<b>*a. Legal Name:</b> Charter Township of Waterford	
<b>*b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 38-6007299	<b>*c. Organizational DUNS:</b> 07-424-4286

**d. Address:**

<b>*Street 1:</b>	<u>5200 Civic Center Drive</u>
<b>Street 2:</b>	_____
<b>*City:</b>	<u>Waterford</u>
<b>County:</b>	<u>Oakland</u>
<b>*State:</b>	<u>Michigan</u>
<b>Province:</b>	_____
<b>*Country:</b>	<u>USA</u>
<b>*Zip / Postal Code</b>	<u>48329</u>

**e. Organizational Unit:**

<b>Department Name:</b> Community Planning and Development	<b>Division Name:</b>
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**f. Name and contact information of person to be contacted on matters involving this application:**

<b>Prefix:</b> <u>Mr.</u>	<b>*First Name:</b> <u>Robert</u>
<b>Middle Name:</b> <u>W.</u>	
<b>*Last Name:</b> <u>Vallina</u>	
<b>Suffix:</b> _____	

<b>Title:</b> Community Planning and Development Director
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<b>Organizational Affiliation:</b>
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<b>*Telephone Number:</b> 248-618-7443	<b>Fax Number:</b> 248-674-4097
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<b>*Email:</b> rvallina@twp.waterford.mi.us
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**Application for Federal Assistance SF-424**

Version 02

**\*9. Type of Applicant 1: Select Applicant Type:**

C. City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\*Other (Specify)

**\*10 Name of Federal Agency:**

**U.S. Department of Housing and Urban Development**

**11. Catalog of Federal Domestic Assistance Number:**

14.256 \_\_\_\_\_

CFDA Title:

Neighborhood Stabilization Program \_\_\_\_\_

**\*12 Funding Opportunity Number:**

FR-5321-C-01 \_\_\_\_\_

\*Title:

Neighborhood Stabilization Program 2 under the American Recovery and Reinvestment Act, 2009 \_\_\_\_\_

**13. Competition Identification Number:**

\_\_\_\_\_

Title:

\_\_\_\_\_

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

**Charter Township of Waterford**

**\*15. Descriptive Title of Applicant's Project:**

Homebuyer Assistance Program for Low-Moderate-Middle-Income Families and Vacant Foreclosed Residential Property Acquisition/Demolition/Redevelopment in Census Tracts 1440, 1441, 1442, 1443, 1444, 1453, 1454, and 1455

**Application for Federal Assistance SF-424** Version 02

**16. Congressional Districts Of:**  
\*a. Applicant: MI-009 \*b. Program/Project: MI-009

**17. Proposed Project:**  
\*a. Start Date: 09/01/2009 \*b. End Date: 08/31/2012

**18. Estimated Funding (\$):**

*a. Federal	_____	\$6,000,000
*b. Applicant	_____	
*c. State	_____	
*d. Local	_____	
*e. Other	_____	
*f. Program Income	_____	
*g. TOTAL	_____	

**\*19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on \_\_\_\_\_

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E. O. 12372

**\*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

Yes  No

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

**Authorized Representative:**

Prefix: Mr. \*First Name: Carl

Middle Name: W.

\*Last Name: Solden

Suffix: \_\_\_\_\_

\*Title: Township Supervisor

\*Telephone Number: 248-674-6201 Fax Number: 248-674-5451

\* Email: csolden@twp.waterford.mi.us

\*Signature of Authorized Representative: *Carl W. Solden* \*Date Signed: 7-14-09

NSP2 Application ID Number: 379557580  
DUNS #07-424-4286  
CHARTER TOWNSHIP OF WATERFORD, MICHIGAN  
NSP2 APPLICATION

NSP2 Application ID Number: 379557580 Jurisdiction(s): <b>Charter Township of Waterford</b> Jurisdiction Web Address: <a href="http://www.twp.waterford.mi.us/supervisor/ARRA.htm">www.twp.waterford.mi.us/supervisor/ARRA.htm</a> <i>(URL where NSP2 materials are posted)</i>	NSP2 Contact Person: Robert W. Vallina Address: 5200 Civic Center Dr. Telephone: 248-618-7443 Fax: 248-674-4097 Email: <a href="mailto:rvallina@twp.waterford.mi.us">rvallina@twp.waterford.mi.us</a>
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***APPLICATION OVERVIEW:***

The Charter Township of Waterford, a community in the geographic center of Oakland County Michigan and encompassing an area of nearly 36 square miles, is home to 73,150 persons according to the 2000 Census. The U.S. Census Bureau's 2006 American Community Survey indicates that 96 percent of Waterford's 31,000 total housing units, or 29,760 housing units, were estimated to be occupied. Of the total estimated occupied units in 2006, 23,510 were owner-occupied housing units, and 6,250 were renter-occupied housing units. However, since then the housing foreclosure crisis has imposed the greatest negative impact on the Township's single-family residential housing inventory. A prime indicator of the negative impact already placed on the Township's single-family housing inventory by the foreclosure crisis can be measured through the current inventory of 1,046 foreclosed vacant single family housing units in Waterford, according to information provided by realtytrac.com. The negative impact is further reflected in the U.S. Department of Housing and Urban Development's NSP target geography, where over 60 percent of the Township's area consists of census tracts with foreclosure scores of 18 and 19. Another indicator, according to information provided by realtytrac.com, is the precipitous drop of 31 percent in Waterford median home values between December 2007 and December 2008.

The decline of the U.S. auto industry has resulted in economic devastation throughout our entire region, including Waterford. Michigan has experienced a depression like economy for the past three years and has been unhealthy for the six years prior. The state ranks worst in the nation for job creation. With General Motors and Chrysler recent bankruptcy filings, the state of Michigan will see more auto plant closings, causing another 21,000 citizens to lose their jobs. A General Motors parts warehouse facility is located in Waterford and that closed in March of this year, translating into a loss of 1,200 jobs. Meanwhile the Waterford TTX plant, a train manufacturer, went from employing 200 workers down to 4 caretaker workers. Oakland County will see two more auto plants closed and another idled. Waterford Township has been severely impacted by these job losses, as is evidenced by the unemployment statistics. According to the Michigan Department of Labor and Economic Growth (MDLEG), Waterford Township unemployment went from 3.3 percent in 2000 up to 6.0 percent in 2002, ranged between 6.4 to 6.6 percent in 2003-2006, increased to 7.0 percent in 2007, and increased again to 8.1 percent in 2008. According to MDLEG, Waterford's unemployment shot up further during the first four months, to nearly 13 percent. The economic distress of the Waterford community is also reflected in the poverty statistics. According to the U.S. Census Bureau, Waterford's poverty rate increased

from 5.1 percent of Waterford's population living below poverty level in 1999 to 9 percent of the population in 2007.

When the U.S. Department of Housing and Urban Development (HUD) established the Neighborhood Stabilization Program (NSP) to implement the objectives of Title III of Division B of the Housing and Economic Recovery Act of 2008 (HERA) and notified Waterford Township that it was eligible to receive \$2,014,489 in NSP entitlement funds, the Township was eager to do its part to reduce the impact of at least one of the negative factors impacting the community. Waterford leveraged its funding and developed a public-private-nonprofit effort to reduce the inventory of vacant foreclosed residential properties and assist low-moderate-middle-income families to repair, own, and reside in such properties. Waterford's initial NSP efforts dedicated 35 percent of its entitlement funds to assist 20 low-income families repair and acquire vacant foreclosed residential properties. Waterford dedicated another 35 percent of its entitlement funds to assist 80 moderate-middle-income families repair and acquire vacant foreclosed residential properties and 25 percent to acquiring and demolishing vacant foreclosed properties beyond repair. The remaining 5 percent of the funding was reserved for program administration.

Since the Township initiated its NSP effort, 225 people have applied for assistance and of those 150 have been found to be income-eligible. Therefore, the Township's pool of income-eligible NSP applicants is already at 150 percent of its original overall homebuyer assistance goal. Additionally, over half of the income-eligible applicants are low-income; the current pool of low-income applicants is at 400 percent of the Township's original low-income homebuyer assistance goal (*80 current low-income applicants; the assistance goal is 20 low-income applicants*). The current pool of moderate-middle-income applicants is at 88 percent of the Township's original moderate-middle-income homebuyer assistance goal (*70 current moderate-middle-income applicants; the assistance goal is 80 moderate-middle-income applicants*).

The Township has already used NSP funds for five low-income and two moderate-middle income families to repair, acquire, and own and occupy formerly vacant foreclosed properties. Based on the Township's first NSP assistance cases, the Township has found that:

- The average amount of homebuyer assistance needed for each low-income applicant to repair and then acquire such houses is \$48,000. At that rate, the Township will require over \$3 million above its original NSP funds allocated to assist all of its current low-income applicants. The Township also anticipates an additional 40 new low-income applicants, which will require another \$1.8 million of NSP funds.
- The average amount of homebuyer assistance needed for each moderate-middle-income applicant to repair and then acquire such houses is \$10,000. At that rate, the Township will require over \$100,000 above its original NSP funds allocated to assist all of its current moderate-middle-income applicants as well as the 10 additional applicants to achieve our original moderate-middle income assistance goal. The Township also anticipates an additional 44 new moderate-middle income applicants, which will require another \$440,000 of NSP funds.

The Township also anticipates identifying an additional eight properties for acquisition of vacant foreclosed residential properties that cannot be repaired, demolish the buildings, and then donate such properties to a nonprofit partnership of Christmas in Action of Oakland County and Habitat for Humanity to be redeveloped into housing for low-income households. This additional acquisition/demolition/redevelopment work is estimated to require an additional \$500,000.

In order to achieve and expand the Township's NSP goals, target and reconnect neighborhoods, rapidly arrest decline, expand the NSP "deep targeting requirement for assisting low-income households, eliminate destabilizing influences, and ensure the longest feasible continued affordability of housing, Waterford Township is submitting an application request for \$6,000,000 Neighborhood Stabilization 2 funds provided under the American Reinvestment and Recovery Act of 2009. Waterford proposes to dedicate 80 percent of this funding request to assist low-income homebuyers acquire and repair vacant foreclosed residential properties located in the target geography to use as their principal residence. The Township intends to achieve its NSP goals by leveraging its NSP2 funds with private sector resources to continue and expand the following NSP activities that were established with the first round of NSP funding, listed in **Table 1** below.

**Table 1 - Charter Township of Waterford Proposed NSP2 Activities**

Activity Title	Proposed Allocation	NSP/CDBG Eligibility	Projected Minimum Output
Low-Income Homebuyer Assistance Program	\$4,800,000	NSP (A)/ 24 CFR 570.201(n) and 202	100 low-income households assisted (120 total low-income households assisted through combined NSP/NSP2 efforts)
Moderate/Middle-Income Homebuyer Assistance Program	\$540,000	NSP (A)/ 24 CFR 570.201(n) and 202	44 moderate-middle-income households assisted (124 total low-income households assisted through combined NSP/NSP2 efforts)
Acquisition/Demolition/Redevelopment	\$500,000	NSP (B), (D), & (E)/ 24 CFR 570.201(a), (d), & (b)	8 blighted residential properties demolished
Program Administration	\$160,000	24 CFR 570.206(a)	n/a

## A. FACTOR 1 - NEED/EXTENT OF THE PROBLEM

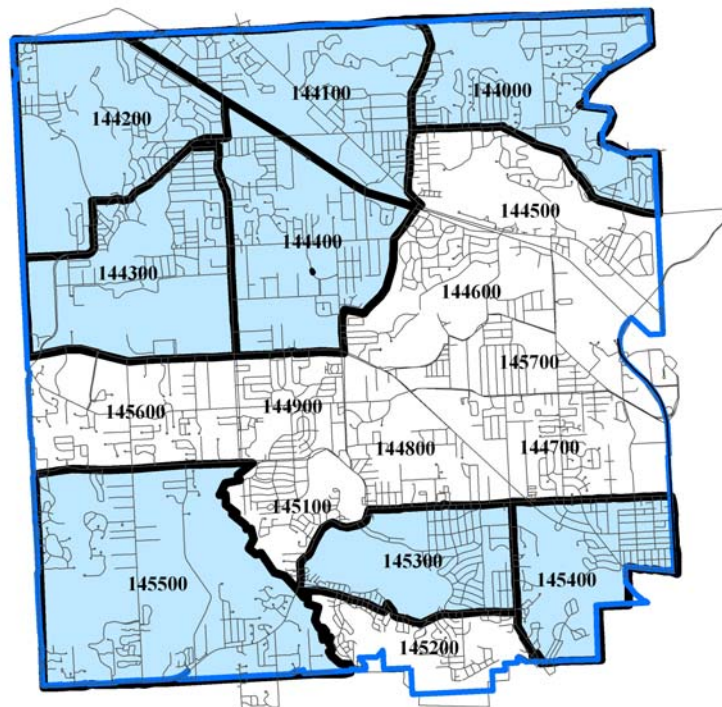
### TARGET GEOGRAPHY

The Charter Township of Waterford, a community in the geographic center of Oakland County Michigan and encompassing an area of nearly 36 square miles, is home to 73,150 persons according to the 2000 Census. The U.S. Census Bureau's 2006 American Community Survey indicates that 96 percent of Waterford's 31,000 total housing units, or 29,760 housing units, were estimated to be occupied. Of the total estimated occupied units in 2006, 23,510 were owner-occupied housing units, and 6,250 were renter-occupied housing units.

However, since then the housing foreclosure crisis has imposed the greatest negative impact on the Township's single-family residential housing inventory. A prime indicator of the negative impact the foreclosure crisis has imposed on the Township's single-family housing inventory is the number of properties undergoing the foreclosure process as documented by realtytrac.com. According to the listings provided by realtytrac.com, there were 839 foreclosed single-family properties in Waterford on September 30, 2008. In June, 2009, this number increased to 1,046 foreclosed vacant single family housing units in Waterford, according to information provided by realtytrac.com. Another indicator provided by realtytrac.com, is the precipitous drop of 31 percent in Waterford median home values between December 2007 and December 2008.

While the current inventory of vacant foreclosed properties are evenly distributed throughout the Township, over 50 percent of these foreclosed properties are located in Census Tracts 1440, 1441, 1442, 1443, 1444, 1453, 1454, and 1455, identified by HUD as NSP2 target geography. Over 60 percent of the Township's total area consists of NSP2 target geography with foreclosure scores of 18 and 19, as shown on Map 1 below:

**MAP 1 – NSP2 TARGET GEOGRAPHY**



### **MARKET CONDITIONS AND DEMAND FACTORS**

The decline of the US auto industry has devastated our entire region. Michigan has experienced a depression like economy for the past three years and has been unhealthy for the six years prior. The state ranks worst in the nation for job creation. With General Motors and Chrysler recent bankruptcy filings, the state of Michigan will see more auto plant closings, causing another 21,000 citizens to lose their jobs. Waterford had a General Motors parts warehouse that closed in March of this year, translating into a loss of 1,200 jobs. Meanwhile the Waterford TTX plant, a train manufacturer, went from employing 200 workers down to 4 caretaker workers. Oakland County will see two more auto plants closed and another idled. Waterford Township has been severely impacted by these job losses, as is evidenced by the unemployment statistics. According to the Michigan Department of Labor and Economic Growth (MDLEG), Waterford Township unemployment went from 3.3 percent in 2000 up to 6.0 percent in 2002, ranged between 6.4 to 6.6 percent in 2003-2006, increased to 7.0 percent in 2007, and increased again to 8.1 percent in 2008. According to MDLEG, Waterford's unemployment shot up further during the first four months, to nearly 13 percent. The economic distress of the Waterford community is also reflected in the poverty statistics. According to the U.S. Census Bureau, Waterford's poverty rate increased from 5.1 percent of Waterford's population living below poverty level in 1999 to 9 percent of the population in 2007.

Waterford Township's housing inventory did not grow as a result of over-building. As shown in table 2 below, Waterford's housing inventory growth was steady, with over 94 percent of its housing stock constructed prior to 2000. The age of Waterford's housing stock, with over 75 percent less than 60 years old, indicates a strong level of structural stability.

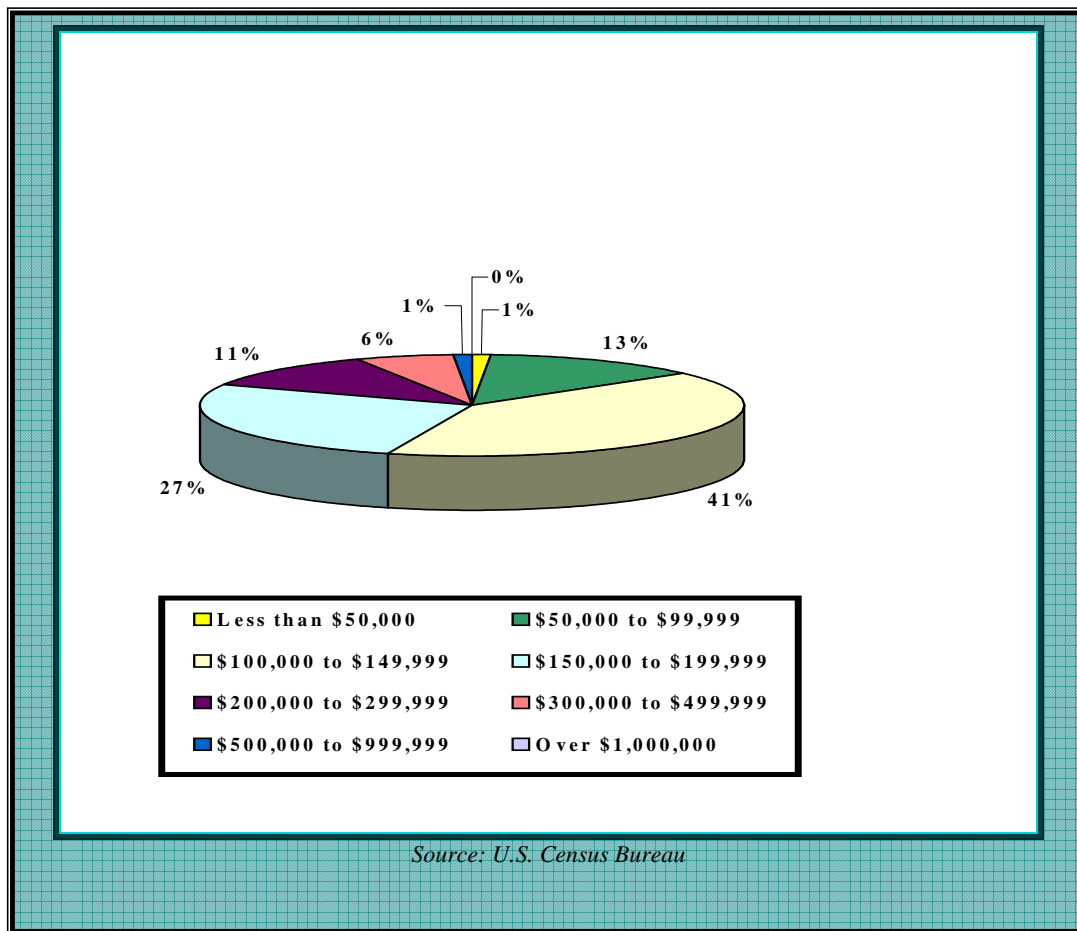
**Table 2 Residential Construction Detail - Waterford Township: 1900-2008**

<b>Decade</b>	<b>Number Built</b>	<b>Number of Bedrooms</b>	<b>Number of Bathrooms</b>	<b>Unit Size (sq. ft.)</b>	<b>Lot Size (acres)</b>
1900-1909	118	3.7	1.7	1,900	0.97
1910-1919	111	3.3	1.6	1,666	0.46
1920-1929	1,897	2.7	1.3	1,218	0.34
1930-1939	921	2.7	1.3	1,275	0.46
1940-1949	2,713	2.7	1.3	1,250	0.51
1950-1959	6,204	2.9	1.3	1,245	0.39
1960-1969	3,000	3.1	1.6	1,477	0.43
1970-1979	2,395	3.1	1.6	1,491	0.39
1980-1989	1,822	3.0	1.8	1,595	0.51
1990-1999	3,243	3.1	2.3	1,821	0.34
2000-2008	1,329	3.4	2.6	2,166	0.37

Source: Oakland County Planning and Economic Development Services and Southeast Michigan Council of Governments

Waterford’s housing values are not over-valued and reflect a substantially lower middle class affordability range, as shown in Figure 1 below.

**Figure 1 Distribution of 2000 Housing Values in Waterford Township**



Based on the factors identified above, Waterford has identified homebuyer assistance programs for low-income and for moderate-middle-income households as the most likely to rapidly arrest decline, target and reconnect neighborhoods, and stabilize the community’s housing market. The Township has also determined that a smaller acquisition/demolition/redevelopment program is critical to eliminating destabilizing influences, such as the occasional vacant foreclosed home beyond repair, through surgical strikes to ensure that such foreclosed properties do not destabilize the surrounding neighborhood.

It is apparent from Waterford’s initial NSP implementation that there is demand for such an approach. After only three months since the Township’s NSP grant agreement was signed, the Township’s income-eligible applicant pool is 150 percent of the initial total applicant goal. Applications continue to be received by the Township, so the Township is certain that there is no lack of demand and that the market can absorb this demand while reducing the number of vacant foreclosed properties.

## ***B. FACTOR 2 – DEMONSTRATED CAPACITY OF THE APPLICANT AND RELEVANT ORGANIZATIONAL STAFF***

### **PAST EXPERIENCE OF THE APPLICANT**

The Charter Township of Waterford has been a Community Development Block Grant (CDBG) entitlement community since the inception of the CDBG Program 35 years ago. Waterford has operated a CDBG-funded housing rehabilitation deferred payment loan program since becoming a CDBG entitlement community. Since Waterford began its Housing Rehabilitation Program 34 years ago, \$10.5 million have been spent to rehabilitate 1,648 houses; an average of \$6,371.00 per house. Of this total, during the past two years Waterford Township rehabilitated 82 houses.

The Township has also successfully created and implemented its Neighborhood Stabilization Program (NSP). During the first three months of the NSP, the Township has provided homeownership counseling to 40 income-eligible applicants. The Township has already provided homebuyer assistance, including home repair, so that five low-income applicants and two moderate-middle-income applicants were able to purchase vacant foreclosed houses and are now owner-occupants of these houses. The Township has also scheduled homeownership counseling for the remaining 110 income-eligible applicants during July, August, and November 2009.

### **MANAGEMENT STRUCTURE**

The Charter Township of Waterford possesses a full-service administrative structure with built-in checks and balances to ensure not only successful implementation, but also effective oversight, accountability, and transparency to achieve Waterford's NSP goals and objectives. The Township has also leveraged and enhanced its administrative structure by partnering with local realtors, lenders, and nonprofit organizations to provide a complete delivery system capable of processing both the current NSP funds granted to the Township as well as additional competitive grant NSP funds. The following identifies the various components of the Township's NSP administrative structure and the positions responsible for administering Waterford's Neighborhood Stabilization Program:

#### **A. LEGISLATIVE AUTHORITY AND OVERSIGHT**

The Township Board of Trustees possesses the authority to adopt and approve grant funding for the Township, authorizing specified officials to sign grant agreements and implement such projects and action plans adopted as part of the grant funding. For the NSP, the Township Board approved the Township's action plan at its November 10, 2008 meeting. The Township Board also possesses the authority to approve all payment requests submitted and processed through the Township's Accounting personnel (*Please refer to the Accounting and Auditing section below*).

#### **B. ADMINISTRATIVE GRANT AUTHORIZATION AND MANAGEMENT OVERSIGHT**

The Township Supervisor, Waterford's chief elected official and a member of the Township Board, was authorized by the Township Board to be the official representative of the Township in accordance with the regulations established for the Neighborhood Stabilization Program for the certifications relative to applying for supplementary Community Development Block Grant funding and to sign all grant agreement documents required to

receive such funds. The Township Supervisor also possesses the ultimate administrative authority over the management of the NSP program.

### **C. NSP DELIVERY SYSTEM IMPLEMENTATION, GRANT OVERSIGHT, AND DRAWDOWN PREPARATION**

#### **Community Planning and Development Director**

The Community Planning and Development (CPD) Director is responsible for:

- overseeing and coordinating the Township staff and business and nonprofit partners who implement each stage of the Township's NSP delivery system and ensuring that each step is completed in accordance with Township and HUD requirements.
- compliance with NSP documentation and record-keeping requirements.
- preparing all NSP fund drawdowns through the DRGR system.
- grant financial management of, and record keeping for, the NSP funds.
- overall grant management of the NSP.
- conducting educational meetings with NSP participating realtors and lenders.
- reviewing the good faith estimate submitted by each NSP applicant's FHA lending institution to determine the level of down payment/mortgage/FHA 203(k) streamlined rehabilitation assistance.
- working with the Building and Engineering Director to identify vacant single-family residential properties within the NSP Target Areas containing blighted structures for acquisition by the Township, conducting the acquisition process, overseeing demolition bid and work completion of the properties acquired, and coordinating disposition of such properties to an adjacent property owner or to Habitat for Humanity.

During the active timeframe of the NSP, the CPD Director will devote about 25 percent of his time to NSP administration.

#### **Housing Rehabilitation Program Counselor**

The Housing Rehabilitation Program Counselor, under the direction of the CPD Director, is responsible for:

- reviewing NSP down payment assistance applications to determine income-eligibility.
- working with the nonprofit organizations partnering with the Township to provide homeownership counseling classes, the facility where the classes will be located, and the child care services to be provided as a service to the NSP applicants, as well as the business partner who will provide meals for the applicants.
- scheduling home inspections by the Building and Engineering Department inspectors team for vacant foreclosed houses to be acquired by low-income NSP applicants.
- assisting lenders with the FHA 203 (k) streamlined work specifications preparation and qualified contractor bid process for rehabilitation work on vacant foreclosed houses to be acquired by low-income NSP applicants.

During the active timeframe of the NSP, the Housing Rehabilitation Program Counselor will devote about 25 percent of her time to NSP duties.

#### **Community Planning and Development Department Typist/Clerk II**

The Typist/Clerk II, under the direction of the CPD Director and the Housing Rehabilitation Program Counselor, is responsible for:

- providing information to citizens inquiring about the NSP.
- assisting applicants with completing NSP applications.

- transmitting the application information of income-eligible applicants to the nonprofit organization partnering with the Township to provide credit score analysis services.
- coordinating flow of documentation between the Township and FHA lenders serving NSP applicants.
- maintaining the NSP case documentation and files.

During the active timeframe of the NSP, the Typist/Clerk II will devote about 25 percent of her time to NSP duties.

#### *Building and Engineering Director*

The Building and Engineering Director will be responsible for:

- overseeing the home inspections conducted and work specifications prepared by the Building and Engineering Department inspector team for vacant foreclosed houses to be acquired by low-income NSP applicants.
- working with the Community Planning and Development Director to identify vacant single-family residential properties within the NSP Target Areas containing blighted structures for acquisition by the Township.

#### **D. DRAWDOWN AUTHORIZATION**

The Township Treasurer, an elected official and member of the Township Board, and the Deputy Treasurer will be responsible for authorizing all NSP fund drawdowns through the DRGR system.

#### **E. ACCOUNTING AND AUDITING**

The Township Clerk, an elected official and member of the Township Board, is responsible for the Township's accounts payable process and maintaining all official Township accounting records. All invoices for NSP expenditures will be transmitted to the Township Clerk's Office for payment processing. All invoices processed for payment are then sent to the Township Board for approval.

#### **F. NON-PROFIT PARTNERS**

**Oakland Livingston Human Service Agency (OLHSA)** is a private non-profit Community Action Agency whose mission is to enable the low-income, elderly and disabled living in Oakland and Livingston Counties to become more self-sufficient. OLSHA has been hired by the Township to provide a credit report analysis for each income-eligible applicant to ensure that the applicant possesses a credit score acceptable to FHA lenders. OLHSA is also responsible for providing homeownership counseling services to Waterford's NSP applicants. Since OLHSA provides such services to more than just Waterford, the scheduling of applicants for each homeownership counseling class is limited to 30-35 applicants. In order to provide for a steady applicant processing flow, classes are scheduled at a rate of approximately every other month.

**Centerpoint Church** is located in Waterford and possesses meeting rooms available for rent for nondenominational activities. In addition, the Church is able to provide child care staff. The Township has partnered with the church to provide the meeting room space for OLHSA to conduct the homeownership classes at a convenient location during evening hours with child care availability and provision of meals.

## **G. BUSINESS PARTNERS**

### *Realtors*

During January-March 2009, four informational meetings were held at the local Board of Realtors to educate realtors about Waterford's NSP. Realtors indicating their willingness to be NSP partners signed a letter of understanding and were added to a participating realtors list. This list is handed out to NSP applicants as soon as they complete the homeownership counseling classes. NSP applicants are then able to choose the participating realtor of their choice to assist them with finding an NSP-eligible property to purchase. Currently, the Township's NSP participating realtors list includes 133 realtors.

### *FHA Lenders*

In addition to the participating realtors list, NSP applicants completing the homeownership counseling classes are also provided lists of Waterford and Oakland County lenders identified on the U.S. Department of Housing and Urban Development website as approved to provide FHA loans as well as lenders authorized to provide FHA loans through the 203(k) streamlined program. As soon as an applicant selects and contacts one of the listed lenders, Waterford staff meets with the lender and reviews the NSP process, required NSP second mortgage and note, and works out the details for determining the level of down payment and mortgage assistance, including such funding needed to subsidize 203(k) streamlined repairs. The Township then partners with the lender through the closing to ensure that the NSP applicant receives NSP assistance as efficiently as possible.

## **H. NSP DELIVERY SYSTEM**

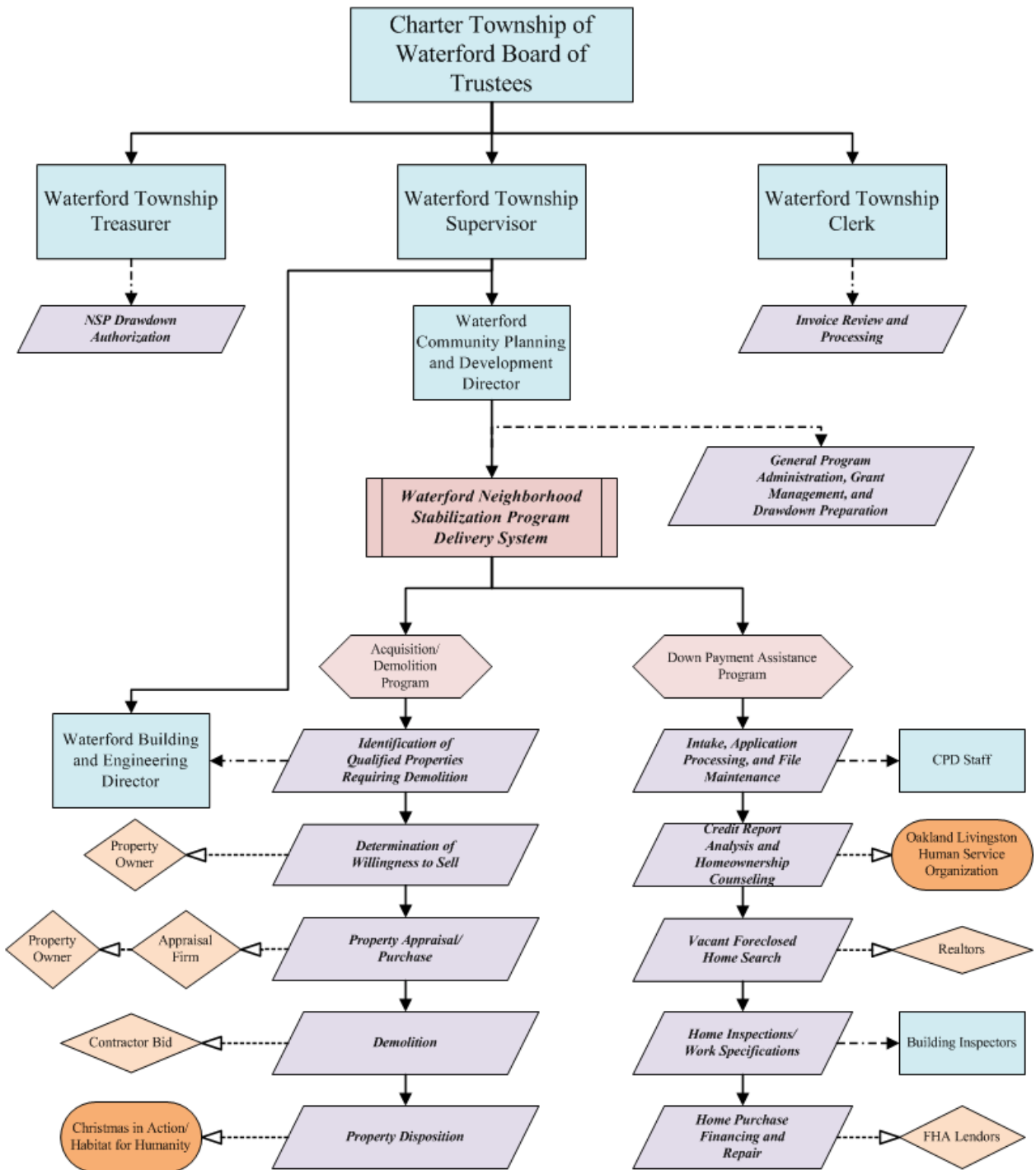
The NSP delivery system has been developed with the express purpose of possessing the capacity to:

- effectively manage and disburse all of the NSP funding granted and, where applicable, NSP2 funding awarded to Waterford;
- leverage municipal resources with nonprofit and private sector resources;
- efficiently serve NSP applicants on an individualized basis through a managed client flow;
- maintain the highest standards of transparency and accountability; and
- achieve NSP goals and objectives as expeditiously as possible.

The organization chart for Waterford's NSP delivery system is shown in Figure 2 below:

Figure 2

# Organization Chart Waterford Neighborhood Stabilization Program



**I. GRANT MANAGEMENT**

The CPD Director, with the assistance of the Housing Rehabilitation Program Counselor and Typist Clerk II, will be responsible for:

1. Implementing and maintaining the NSP Action Plan for the Charter Township of Waterford.
2. Complying with applicable environmental requirements, and where such compliance is required, all federal labor standards requirements.
3. Ensuring compliance with applicable equal opportunity and fair housing requirements.
4. Preparing and publishing all legal notices, facilitating all required public hearings and informational meetings, and providing all documentation and information to be published on the Township website to comply with all transparency goals.
5. Establishing and maintaining complete and accurate project case files and preparing all grant documentation and performance reports.
6. Providing technical assistance to applicants and lenders, including assisting lenders with the FHA 203 (k) streamlined work specifications preparation and qualified contractor selection and oversight.
7. Scheduling and providing the logistical support for the homeownership counseling provided by the Oakland Livingston Human Service Agency.
8. Reviewing and tracking all project expenditures and payment requests to ensure compliance with and applicability to the NSP action plan and budget.
9. Processing grant drawdown requests and reports through the Disaster Recovery Grant Reporting (DRGR) System. The principal drawdown request preparer will be the CPD Director and the backup drawdown request preparer will be the Housing Rehabilitation Program Counselor.
10. Verifying income of NSP applicants to ensure compliance with HUD income requirements.
11. Preparing and filing of all NSP soft second mortgage notes and mortgages.
12. Monitoring and verifying NSP homeowner tenure during the active mortgage period, preparing satisfaction of mortgage documents upon completion of the active mortgage period, and accounting for all program income resulting from early loan payoffs.
13. Serving as the primary acquisition agent for Township NSP blighted property purchases. This includes, but is not limited to, researching properties, coordinating Building and Engineering Department inspection of selected properties, ordering independent appraisals, negotiating terms and conditions of voluntary purchase agreements, and coordinating and attending closings with title companies.
14. Coordinating bidding and work completion of demolition of blighted properties purchased by the Township with NSP funds.
15. Serving as the primary disposition agent for Township NSP blighted property purchases. This includes, but is not limited to, negotiating donation terms and conditions of property transfer to the nonprofit organizations Christmas in Action of Oakland County and Habitat for Humanity in return for dedicating the property to constructing a new home for owner-occupation by low-income families. This may also include negotiating terms and conditions of property sale to an adjacent property in such instances where the Township acquired a nonconforming blighted structure on a property deemed unbuildable as a standalone property in accordance with the standards of the Township Zoning Ordinance.

**J. FINANCIAL MANAGEMENT**

- A. The Township's accounting staff in the Township Clerk's office possesses the following financial responsibilities:
1. Reviewing and preparing checks for NSP expenditures authorized and submitted by the Community Planning and Development Department.
  2. Entering all NSP expenditures and revenues into the Township's existing accounting system.
  3. Monitoring the Community Planning and Development Department NSP grant management records to ensure that such records conform to the Township's official accounting records.
  4. Ensuring that the Township's auditing firm is provided with all documentation needed to conduct annual audits of the Township's financial records and accounting system.
- B. Approving grant drawdown requests through the Disaster Recovery Grant Reporting (DRGR) System will be the responsibility of the Township Treasurer's office. The drawdown request approver will be the Township Treasurer or the Deputy Township Treasurer.
- C. Financial record keeping will be done in conformance with HUD and Township of Waterford regulations. The original financial documents (requests for payment with attached supporting material) will be retained in the Township Clerk's office and imaged record-keeping in the Township's electronic document management system.
- D. Fund accounting for the NSP will be set up with identified separate line item accounts within the Township's general ledger accounting system.

### ***C. FACTOR 3 – SOUNDNESS OF APPROACH***

#### **OVERALL PROGRAM AND HOW IT WILL ACHIEVE OUTCOMES IN TARGET GEOGRAPHY**

In order to more effectively address the impact of home foreclosures in the Township's target geography, the Township is proposing to expand its existing NSP efforts through the use of NSP2 funds for the following activities:

- The Township shall use eight percent of its requested NSP2 funds to identify at least eight vacant foreclosed single-family residential properties within the NSP2 target geography that are blighted homes, acquire such properties at a discount of at least one percent less than the current market appraised value and demolish the blighted home structures. Once the acquired properties are cleared, they will be donated to the 501(c)3 organization Christmas in Action which will partner with Habitat for Humanity to construct new housing for low-income homeowners. This activity is intended to assist in substantially reducing the number of vacant housing units created by home foreclosures. The redevelopment of the property through the partnership of Christmas in Action and Habitat for Humanity will result in affordable housing for low-income households that will contribute to a reduction in the percentage of homes financed by subprime mortgage related loans as well as assist in the significant reduction in the rate of home foreclosures.
- The Township shall use 80 percent of its requested NSP2 funds to provide homebuyer assistance to at least 100 eligible low-income homebuyers and nine percent of its requested NSP2 funds to provide homebuyer assistance to at least 44 eligible moderate-middle-income homebuyers to purchase vacant foreclosed single-family residential properties within the NSP2 target geography. The Township's homebuyer assistance efforts will also result in a reduction in the percentage of homes financed by subprime mortgage related loans since the Township's NSP homebuyer assistance funds will be leveraged through FHA-approved lending institutions and limited to traditional 30- and 15-year fixed mortgages. NSP eligible single-family homes requiring repairs necessary to achieve compliance with the Michigan Rehabilitation Code for Existing Buildings shall be assisted through FHA's streamlined 203(k) program. In order to ensure long-term affordability, the assistance the homebuyer receives from the Township will be secured in accordance with the requirements described below in the continued affordability subsection. The Township shall also use these requested NSP2 funds to provide mandatory housing counseling services to income-eligible applicants prior to them receiving NSP homebuyer assistance.

The Township anticipates that its expanded NSP efforts funded through NSP2 will realize a substantial stabilization of the housing market and achieve long-term economic benefits in the Waterford NSP2 target geography by the end of 2010.

**USE OF FUNDS (IN TABLE AND NARRATIVE) AND FIRM COMMITMENTS****Table 1 - Charter Township of Waterford Proposed NSP2 Activities**

Activity Title	Proposed Allocation	NSP/CDBG Eligibility	Projected Minimum Output
Low-Income Homebuyer Assistance Program	\$4,800,000	NSP (A)/ 24 CFR 570.201(n) and 202	100 low-income households assisted (120 total low-income households assisted through combined NSP/NSP2 efforts)
Moderate/Middle-Income Homebuyer Assistance Program	\$540,000	NSP (A)/ 24 CFR 570.201(n) and 202	44 moderate-middle-income households assisted (124 total low-income households assisted through combined NSP/NSP2 efforts)
Acquisition/Demolition/Redevelopment Program	\$500,000	NSP (B), (D), & (E)/ 24 CFR 570.201(a), (d), & (b)	8 blighted residential properties demolished
Administration	\$160,000	24 CFR 570.206(a)	n/a

**Activity Name: [Low-Income Homebuyer Assistance Program](#)**

**Activity Type:** This is an NSP eligible activity type A – Establish financing mechanisms for purchase and redevelopment of foreclosed residential properties. Direct homeownership assistance is an eligible CDBG activity under 24 CFR 570.201(n) and rehabilitation is an eligible CDBG activity under 24 CFR 570.202.

**National Objective:** As participation will be limited to households below 50% of area median income this activity will meet the national objective.

**Activity Description:** \$4,800,000 in NSP2 funding is being requested for this activity. This activity targets those households below 50% AMI. The tenure of the beneficiaries is homeownership. **The Township already has 60 applicants in the NSP process who are income-eligible and scheduled for homeownership counseling and will benefit from this grant; the Township estimates that \$2.8 million of the requested funding will be used to provide assistance to these applicants.** Income-eligible applicants completing homeownership counseling will be eligible for the following homeownership assistance: up to \$3,000 for assistance with the closing costs and/or prepaid expenses to purchase a vacant foreclosed home they will occupy as their primary residence, up to \$8,000 to be applied to the required down payment, and up to \$20,000 in mortgage principal subsidy. Homeownership counseling for all applicants shall also be funded through this activity.

NSP eligible single-family homes requiring repairs necessary to achieve compliance with the Michigan Rehabilitation Code for Existing Buildings shall be coordinated through FHA's streamlined 203(k) program and the Township shall provide additional financial assistance for reimbursement of repairs to ensure that the 203(k) assistance does not increase the monthly payment burden. The assistance the homebuyer receives from the Township will be a no-interest deferred payment loan subject to recapture in accordance

with the requirements outlined in the Continued Affordability section below. The purchase price must be at least one percent below the current market appraised value after the home is repaired. This activity will address that need for continued affordability. It will also help stabilize neighborhoods by encouraging applicants to become owner occupants of vacant foreclosed homes.

**Location Description:** On a first-come, first-serve basis, eligible low-income home buyers participating in this NSP activity will be able to receive homebuyer assistance to acquire a vacant foreclosed residential property located in the Waterford NSP2 target geography.

**Performance Measures:** One hundred low income households will receive homebuyer assistance to acquire, and rehabilitate where needed, vacant foreclosed homes within the NSP2 target geography to be used as their principal residence.

**Responsible Organization:** NSP administration will be the responsibility of the Charter Township of Waterford Community Planning and Development Department, 5200 Civic Center Drive, Waterford, MI 48329. Administrator Contact: Robert W. Vallina – (248) 674-6239.

**Activity Name:** **Moderate/Middle-Income Homebuyer Assistance Program**

**Activity Type:** This is an NSP eligible activity type A – Establish financing mechanisms for purchase and redevelopment of foreclosed residential properties. Direct homeownership assistance is an eligible CDBG activity under 24 CFR 570.201(n) and rehabilitation is an eligible CDBG activity under 24 CFR 570.202.

**National Objective:** As participation will be limited to households at or below 120% of area median income this activity will meet the national objective.

**Activity Description:** \$540,000 in NSP2 funding is being requested for this activity. This activity targets those households below 120% AMI. The tenure of the beneficiaries is homeownership. Income-eligible applicants completing homeownership counseling will be eligible for the following homeownership assistance: \$4,000 for assistance to be applied to the closing costs, prepaid expenses, and required down payment to purchase an NSP eligible single family home they will occupy as their primary residence. Homeownership counseling for all applicants shall also be funded through this activity.

NSP eligible single-family homes requiring repairs necessary to achieve compliance with the Michigan Rehabilitation Code for Existing Buildings shall be coordinated through FHA's streamlined 203(k) program and the Township shall provide additional financial assistance for reimbursement of repairs to ensure that the 203(k) assistance does not increase the monthly payment burden. The assistance the homebuyer receives from the Township will be a no-interest deferred payment loan subject to recapture in accordance with the requirements outlined in the Continued Affordability section below. The purchase price must be at least one percent below the current market appraised value after the home is repaired. This activity will address that need for continued affordability. It will also help stabilize neighborhoods by encouraging applicants to become owner occupants of vacant foreclosed homes.

**Location Description:** On a first-come, first-serve basis, eligible moderate-middle-income home buyers participating in this NSP activity will be able to receive homebuyer assistance to acquire a vacant foreclosed residential property located in the Waterford NSP2 target geography.

**Performance Measures:** Forty-four moderate-middle-income households will receive homebuyer assistance to acquire, and rehabilitate where needed, vacant foreclosed homes within the NSP2 target geography to be used as their principal residence.

**Responsible Organization:** NSP administration will be the responsibility of the Charter Township of Waterford Community Planning and Development Department, 5200 Civic Center Drive, Waterford, MI 48329. Administrator Contact: Robert W. Vallina – (248) 674-6239.

**Activity Name:** **Acquisition/Demolition/Redevelopment of Blighted Residential Properties**

**Activity Type:** This is a combination NSP eligible activity type B – Acquisition of vacant foreclosed residential properties, type D – Demolition of blighted structures, & type E – Redevelop demolished properties. Property acquisition is an eligible CDBG activity under 24 CFR 570.201(a), clearance for blighted structures is an eligible CDBG activity under 24 CFR 570.201(d), & disposition of property is an eligible CDBG activity under 24 CFR 570.201 (b).

**National Objective:** As all properties acquired and structures demolished will be located in NSP Target Areas, and redeveloped properties will be sold to low-income homebuyers, this activity will meet the national objective.

**Activity Description:** \$500,000 in NSP2 funding is being requested to acquire at least eight single-family residential properties within the Waterford NSP2 target geography containing blighted structures and then demolishing such structures. Once the acquired properties are cleared, the Township will select a qualified nonprofit subrecipient or partnered nonprofit subrecipients (such as Christmas in Action and Habitat for Humanity) to whom the properties will be donated on condition that such nonprofit organization construct new housing for the benefit of low-income homeowners. The Township shall ensure that such subrecipients provide for the continued affordability for this form of NSP assisted housing.

The acquisition of properties under this activity will be implemented with the goal of purchasing such properties at a discount rate of at least one percent less than the current market appraised value. The Township shall ensure that construction of housing on properties acquired through this activity shall provide for continued affordability.

**Location Description:** All the structures demolished will be located in the Waterford NSP2 target geography.

**Performance Measures:** It is anticipated that 8 single-family residential properties within the NSP Target Areas containing blighted structures will be acquired, the blighted structures demolished and then redeveloped for low-income homeowners.

**Responsible Organization:** NSP administration will be the responsibility of the Charter Township of Waterford Community Planning and Development Department, 5200 Civic Center Drive, Waterford, MI 48329. Administrator Contact: Robert W. Vallina – (248) 674-6239.

**Activity Name:** **Program Administration**

**Activity Type:** N/A

**National Objective:** N/A

**Activity Description:** \$160,000 in NSP2 funding is being requested for general NSP2 administration.

**Location Description:** N/A

**Performance Measures:** N/A

**Responsible Organization:** NSP administration will be the responsibility of the Charter Township of Waterford Community Planning and Development Department, 5200 Civic Center Drive, Waterford, MI 48329. Administrator Contact: Robert W. Vallina – (248) 674-6239.

### **DEMOLITION VS. PRESERVATION**

Waterford's housing inventory growth has been steady, with over 94 percent of its housing stock constructed prior to 2000. The age of Waterford's housing stock, with over 75 percent less than 60 years old, indicates a strong level of structural stability. The increase in vacant foreclosed properties in Waterford is a result of economic factors such as the meltdown in the financial markets and the loss of jobs in the region and not a result of the overall condition of the Township's housing stock. There are isolated occurrences of vacant foreclosed properties that will become a destabilizing influence if they are not removed. Based on these factors, Waterford has identified homebuyer assistance programs for low-income and for moderate-middle-income households as the most likely response to rapidly arrest decline, target and reconnect neighborhoods, and stabilize the community's housing market. The Township has also determined that a smaller acquisition/demolition/redevelopment program is critical to eliminating those isolated occurrences of vacant foreclosed homes beyond repair through surgical strikes to ensure that such foreclosed properties do not remain and destabilize the surrounding neighborhood.

### **PROJECT COMPLETION SCHEDULE**

Based on the fact that the Township already has 60 low-income applicants in the NSP processing pipeline that will utilize NSP2 funding for homeownership assistance, the Township estimates that it will expend 75 percent of allocated funds within one year of the date funds become available and 100 percent of such funds within two years of such date, easily complying with the deadlines imposed by the Recovery Act. The Township anticipates the following monthly project milestones:

#### **October 2009**

- NSP2 funds become available.
- Complete 5 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$265,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 4.5% NSP2 grant obligated/expended.](#)

#### **November 2009**

- Conduct homeownership counseling classes for 30 applicants.
- Acquire 2 properties and demolish structures, obligating \$125,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 6.7% NSP2 grant obligated/expended.](#)

#### **December 2009**

- Complete 2 closings for low-income applicants, obligating \$96,000 in NSP2 funding.

- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 8.4% NSP2 grant obligated/expended.](#)

**January 2010**

- Conduct homeownership counseling classes for 35 applicants.
- Complete 3 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$168,600 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 11.4% NSP2 grant obligated/expended.](#)

**February 2010**

- Complete 5 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$265,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 15.9% NSP2 grant obligated/expended.](#)

**March 2010**

- Conduct homeownership counseling classes for 35 applicants.
- Complete 5 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$265,000 in NSP2 funding.
- Acquire 2 properties and demolish structures, obligating \$125,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 22.5% NSP2 grant obligated/expended.](#)

**April 2010**

- Complete 10 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$504,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 31.0% NSP2 grant obligated/expended.](#)

**May 2010**

- Complete 10 closings for low-income applicants and 5 closings for moderate-middle-income applicants, obligating \$541,500 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 40.2% NSP2 grant obligated/expended.](#)

**June 2010**

- Complete 10 closings for low-income applicants and 3 closings for moderate-middle-income applicants, obligating \$516,900 in NSP2 funding.
- Acquire 2 properties and demolish structures, obligating \$125,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 51.0% NSP2 grant obligated/expended.](#)

**July 2010**

- Complete 10 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$504,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 59.5% NSP2 grant obligated/expended.](#)

**August 2010**

- Complete 5 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$265,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 64.0% NSP2 grant obligated/expended.](#)

**September 2010**

- Complete 5 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$265,000 in NSP2 funding.
- Acquire 2 properties and demolish structures, obligating \$125,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 70.6% NSP2 grant obligated/expended.](#)

**October 2010**

- Complete 5 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$265,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 75.2% NSP2 grant obligated/expended.](#)

**November 2010**

- Complete 5 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$265,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 79.7% NSP2 grant obligated/expended.](#)

**December 2010**

- Complete 2 closings for moderate-middle-income applicants, obligating \$24,600 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 80.2% NSP2 grant obligated/expended.](#)

**January 2011**

- Complete 2 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$120,600 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 82.4% NSP2 grant obligated/expended.](#)

**February 2011**

- Complete 2 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$120,600 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 84.5% NSP2 grant obligated/expended.](#)

**March 2011**

- Complete 2 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$120,600 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 86.6% NSP2 grant obligated/expended.](#)

**April 2011**

- Complete 4 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$216,600 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 90.3% NSP2 grant obligated/expended.](#)

**May 2011**

- Complete 5 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$265,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- [Goal of 94.9% NSP2 grant obligated/expended.](#)

**June 2011**

- Complete 5 closings for low-income applicants and 2 closings for moderate-middle-income applicants, obligating \$265,000 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- **Goal of 99.4% NSP2 grant obligated/expended.**

**July 2011**

- Complete 2 closings for moderate-middle-income applicants, obligating \$263,400 in NSP2 funding.
- Expend \$7,000 in NSP2 funding administering program.
- **Goal of 99.9% NSP2 grant obligated/expended.**

**August 2011**

- Expend \$6,000 in NSP2 funding administering final program reporting.
- **Goal of 100% NSP2 grant obligated/expended.**

The Township also estimates the following start and end dates for each of the proposed NSP2-assisted activities:

Low-Income Homebuyer Assistance Program	October 2009 – June 2011
Moderate/Middle-Income Homebuyer Assistance Program	October 2009 – July 2011
Acquisition/Demolition/Redevelopment	October 2009 – October 2010
Program Administration	October 2009 – August 2011

**INCOME TARGETING FOR 120 AND 50% AMI**

The Township is proposing to dedicate 80 percent of the requested NSP2 funds, a total of \$4,800,000, to a low-income homebuyer assistance program that will assist at least 100 qualified low-income households earning less than 50% AMI. Another 8 percent of the requested NSP2 funds, a total of \$500,000, will be used for an acquisition/demolition/redevelopment program that will ultimately result in benefitting low-income homebuyers. Eight percent of the requested NSP2 funds, a total of \$540,000, will be allocated to a moderate-middle-income homebuyer assistance program that will assist at least 44 qualified moderate-middle-income households earning less than 120% AMI.

**CONTINUED AFFORDABILITY**

For NSP2 assisted homeownership units the Township will ensure continued affordability by establishing homebuyer assistance as a no-interest, no monthly payment loan that will be secured by a second lien on the purchased property. The loan will remain due and payable by the homebuyer (the beneficiary) for the duration of the affordability period in accordance with the following schedule of per housing unit NSP2 assistance received:

<b>Affordability Period for NSP2 Assisted Housing Units</b>	
Affordability Period	Amount of NSP2 Funded Housing Unit Assistance
5 years	Less than \$15,000
10 years	\$15,000 - \$40,000
15 years	Greater than \$40,000

If the beneficiary sells the home or ceases to use it as a principal residence during the affordability period, continued affordability shall be secured through a recapture provision stipulating that upon change of principal residency or sale/transfer of title by the beneficiary to any willing buyer at any price, the NSP2 funds shall be recaptured in accordance with the

following schedule and will be used for additional NSP2 eligible activities or returned to the U.S. Treasury as required by NSP2 rules and regulations:

<b>NSP2 Fund Recapture Schedule</b>		
<b>Affordability Period</b>	<b>Timing of Recapture</b>	<b>Amount Due for Recapture</b>
<b>5 years</b>	Inception to end of Year 5 After end of Year 5	Full amount of loan \$0, loan is forgiven
<b>10 years</b>	Inception to end of Year 5 Year 6 to end of Year 10 After end of Year 10	Full amount of loan Full amount of loan, less \$14,999 \$0, loan is forgiven
<b>15 years</b>	Inception to end of Year 5 Year 6 to end of Year 10 Year 11 to end of Year 15 After end of Year 15	Full amount of loan Full amount of loan, less \$14,999 Full amount of loan, less \$40,000 \$0, loan is forgiven

Upon payment of the recaptured NSP funds, the property is no longer subject to the affordability requirements of this section.

#### **CONSULTATION, OUTREACH, COMMUNICATIONS**

The Township has jurisdiction over its target geography, so therefore the principal consultation is with the chief elected official, the Township Supervisor, and the elected legislative body, the Township Board. Both the Township Board and Township Supervisor were consulted when the original NSP action plan was proposed and again when the NSP2 grant application submittal was proposed. Further, the Township Board is provided monthly updates on NSP program implementation.

The Township has met with Oakland County officials to discuss their respective NSP efforts and continue to share information and updates on NSP and other community development related efforts.

The Township established an aggressive outreach and affirmative marketing approach, using its official website as the foundation of its efforts. Application forms and complete program information are on the website. In addition, the Township Supervisor announced the availability of NSP assistance at the beginning of Township Board meetings. The Township also discussed the program with the local media, resulting in several news stories published and informing the public about obtaining the application and program information from the Township website. Also, one outlet of the national news, NBC Nightly News, highlighted the Township's program in April 2009. Finally, the Township is working closely through the area board of realtors and have educated members of that organization to assist with the outreach and affirmative marketing beyond the borders of the Township. The Township held four informational meetings with area realtors. The Township believes that this approach has worked well, given that there are currently 150 income-eligible applicants that have completed the initial intake processing.

The Township is using its official website to continually communicate program design, process, opportunities and results and also to ensure that local citizens and other interested parties are informed about program policies.

The Township will process any complaints in a timely manner, responding within 15 working days where feasible. Initial complaints will be forwarded by clerical staff to the Township's

Housing Rehabilitation Counselor for resolution. If the complaint cannot be resolved by the Housing Rehabilitation Counselor within three working days, the complaint will be forwarded to the Township's Community Planning and Development Director to be resolved within three working days. The Township Supervisor, as needed, shall review unresolved complaints and appeals of complaint resolutions.

### **PERFORMANCE AND MONITORING**

#### ***MONITORING PLAN***

Waterford Township shall monitor its NSP through the following three methods:

- The first method will be to utilize the DRGR Quarterly Reports to ensure that its NSP goals are being carried out in a timely manner.
- The second method will be utilized by Township Community Planning and Development Department staff to monitor case load. The Housing Rehabilitation Counselor will be responsible for reviewing and determining income-eligibility of applicants during the initial intake process. On a weekly basis, the Community Planning and Development Director shall review such intake work to confirm that income-eligibility is being properly established. The Housing Rehabilitation Counselor shall attend all homeownership counseling classes to ensure that applicants attend and complete the required course. All requests for NSP homeownership assistance shall be based upon a good faith estimate submitted by an FHA lender and shall be reviewed and authorized by the Community Planning and Development Director. Checks for such assistance shall be issued only to an authorized title company acting as escrow agent. The Housing Rehabilitation Counselor shall also attend each loan closing to ensure that the applicant is receiving all NSP assistance authorized by the Township. All invoice monitoring and processing is accomplished by the Township's accounting staff in the Township Clerk's office; this provides a check and balance over the Community Planning and Development Department's internal invoice review and approval. NSP drawdowns, prepared by the Community Planning and Development Director, are monitored and approved by the Township Treasurer's office.
- The third method will be utilized by the Township Board through the information provided in their monthly reports on department activities. Details of the progress of the Township's NSP efforts are submitted and the Township Board provides oversight and ensures that the administrative staff are effectively implementing the Township's NSP efforts.

#### ***INTERNAL AUDIT RESPONSIBILITY***

The Community Planning and Development Director is responsible for the internal audit of the Township's NSP process. On an ongoing basis, the Director reviews and examines program operations and management, discussing current procedures with both staff and outside agencies such as participating realtors and FHA lenders. The Director obtains feedback from all parties to determine where implementation can be improved, what procedures are ineffective, the existence of risky management practices. The Director also obtains feedback from the Township accounting staff, the Township Clerk, the Township Treasurer, and the Township Supervisor to identify and address missing or ineffective internal controls. The Director also compares current procedures and practices to ensure that they are in compliance with program requirements.

***D. FACTOR 4 – REMOVAL OF SUBSTANTIAL NEGATIVE EFFECTS***

According to information provided by realtytrac.com, Waterford Township possesses a current inventory of 1,046 foreclosed vacant single family housing units. Using NSP2 funds, the Township will be funding the acquisition and rehabilitation of 144 foreclosed vacant single family housing units through its homeownership assistance and 8 units to be demolished. Using these numbers for the denominator, the following is the removal of negative effects value using the HUD-provided rubric:

$$1.5 \times (144 + 8) / 1,046 = 0.22$$

## ***E. FACTOR 5 – ENERGY EFFICIENCY AND SUSTAINABLE DEVELOPMENT FACTORS***

### **GREEN BUILDING STANDARDS**

As part of its homeownership assistance programs, the Township is providing funds for each applicant to acquire Energy Star appliances. For houses in need of furnace and water heater replacement, all such retrofits will use Energy Star compliant furnaces and water heaters. The Township shall require use of energy efficient materials as part of all NSP bid specifications. Bid specifications shall also require the sealing of all wall, floor and joint penetrations to prevent pest entry; provide rodent and corrosion proof screens (e.g., copper or stainless steel mesh) for large openings. Where bathroom repairs are needed, the Township shall ensure the use of one-piece fiberglass or similar enclosure or, if using any form of grouted material, use backing materials such as cement board, fiber cement board, fiber-glass reinforced board or cement plaster. The Township shall ensure that bid specifications prohibit the installation of carpet in basements, entryways, laundry rooms, bathrooms and kitchens and will use non-vinyl, non-carpet floor coverings in all rooms whenever possible. Finally, the Township will work to provide a guide for homeowners and renters that explains the intent, benefits, use and maintenance of Green building features, and encourages additional Green activities such as recycling, gardening and use of healthy cleaning materials.

### **RE-USE OF ALL NSP SITES**

The Township intends to acquire at least eight single-family residential properties within the Waterford NSP2 target geography containing blighted structures and then demolishing such structures. Once the acquired properties are cleared, the Township intends to re-use the cleared sites by selecting a qualified nonprofit subrecipient or partnered nonprofit subrecipients (such as Christmas in Action and Habitat for Humanity) to whom the properties will be donated on condition that such nonprofit organization will construct new housing for the benefit of low-income homeowners. The Township shall ensure that such subrecipients provide for the continued affordability for this form of NSP assisted housing.

***F. FACTOR 6 – NEIGHBORHOOD TRANSFORMATION AND ECONOMIC OPPORTUNITY*****CERTIFY CONSISTENCY WITH COMPREHENSIVE PLAN**

The Township's Consolidated Plan established the following long-term objectives:

- The elimination of blight and the prevention of blighting influences within the Township, including elimination and prevention of deteriorated properties and neighborhoods that are important to the welfare of the populace of Waterford Township; principally those of low-and moderate-income.
- The elimination of conditions which are detrimental to health, safety, and public welfare, through housing rehabilitation assistance, and related revitalization of public and private activities.
- The expansion and conservation of the Township's housing stock in order to provide a decent, safe and suitable living environment for all persons, but principally for persons of low-and moderate-income.

Additionally, the Township also identified as one of its priority housing needs:

**Ensure Financial Resources Are Available To Low/Moderate-Income Single-Family Residential Homeowners to Maintain and Upgrade the Structural Integrity of Their Homes**

**DESCRIBE HOW NSP2 ACTIVITIES RELATE TO AND INCREASE THE EFFECTIVENESS OF THE PLAN**

The Township certifies that its NSP2 activities achieve these long-term objectives and priority housing need and are therefore consistent with its Consolidated Plan. The homeownership assistance programs will conserve the Township's housing stock and provide a decent, safe and suitable living environment for persons of low-and moderate-income. The rehabilitation assistance through the homeownership assistance programs shall eliminate conditions which are detrimental to health, safety, and public welfare. These programs will also address the identified priority housing need by ensuring that financial resources are available to low- and moderate-income households to maintain and upgrade the structural integrity of housing units.

The Township's acquisition/demolition/redevelopment program not only shall eliminate blight and prevent blighting influences within the Township but also eliminate conditions which are detrimental to health, safety, and public welfare. Ultimately, the program will expand and conserve the Township's housing stock.

# ***APPENDIX I***

## ***CHARTER TOWNSHIP OF WATERFORD CODE OF CONDUCT***

### **GROUP I - MAJOR OFFENSES**

Violation of Rules and Regulations in this group are considered serious offenses and can result in severe disciplinary action, up to and including immediate discharge.

#### **A. SAFETY**

1. Unsafe act resulting in the injury or loss of life of a person or persons.
2. Falsely stating or making claims of injury or accident.
3. Wanton disregard for the health or safety of others.
4. Major chargeable accident with a Township vehicle.
5. Driving record or driving offenses that affect an employee's ability to perform their job duties because of substance abuse problems.

#### **B. TOWNSHIP PROPERTY AND EQUIPMENT**

1. Deliberate or negligent damage or misuse of Township equipment, tools, vehicles, buildings, furnishings, materials or property.
2. False claim of loss, theft or damage of Township property.

#### **C. PUBLIC EMPLOYEE RESPONSIBILITY**

1. Unlawful or improper conduct during working hours or non- working hours which adversely affects the employee's ability to perform his/her job, his/her relationship with fellow employees, his/her supervisor or the public; or that adversely affects the goodwill or reputation of the Township, its representatives or its citizens.
2. Misuse or improper use of authority or responsibility of Township position.
3. Fraudulent use of paid sick leave or personal leave time.

#### **D. CONDUCT**

1. Immoral conduct or indecency.
2. Fighting or striking another person.
3. Any conviction of a felony.
4. Theft
5. Possession or use or under the influence of alcoholic beverages or nonprescription drugs during working hours (including lunch/break period).
6. Falsification of work records, pay records, vacation records, comp. time records or attendance records.
7. Restrict or interfere with other employees in the performance of their jobs or engaging in any interruption of work.
8. Misappropriation of public funds, materials, equipment or property.
9. Flagrant insubordination to a supervisor, manager or Township official.
10. Intentional falsification of Township records or information.
11. Threatening, intimidating, assaulting or coercing other employees, managers, elected officials or the public.
12. Harassment or discrimination based on an individual's age, sex, religion, race, ethnic background, national origin or disability.

### **GROUP II -PROGRESSIVE DISCIPLINARY ACTION**

Violation of Rules and Regulations in this group will result in the application of progressive discipline.

An employee's record for the past two (2) years will be taken into consideration in determining the appropriate disciplinary action. Each offense, regardless of the rule violated, including offenses under

Group I offenses, will be counted in administering the appropriate next level of disciplinary action.

First Offense -Written Warning

Second Offense - Up to a Three (3) Day Disciplinary Layoff

Third Offense - Up to a Two (2) Week Disciplinary Layoff

Fourth Offense - Up to and including Discharge

#### **A. SAFETY**

1. Minor chargeable accident (\$500 or less damage). (Subject to a non-driving status after third offense.\*)
2. Failure to file a written report of any accident with the Department Head, immediate supervisor or other management representative prior to the end of the shift.
3. Violating any safety rules or practices or engaging in any act or conduct which creates a health or safety hazard.
4. Failure to wear or use required safety equipment or apparel.
5. Unsafe or reckless use of Township vehicle or equipment.
6. Failure to report suspension or revocation of driver's license, or to report a physical or mental condition that impairs ability to use a vehicle or other equipment. (Where job requires use of a vehicle or equipment.)\*
7. Failure to report mechanically defective condition of vehicles or equipment upon knowledge of same.
8. Failure to report a personal injury prior to the end of the shift.
9. Failure to use seat belt.
10. Smoking in an unauthorized area.

\*Non-driving status will require reassignment to another job if available or layoff until there is a suitable opening.

#### **B. TOWNSHIP PROPERTY AND EQUIPMENT**

1. Unauthorized use of any Township equipment, tools, vehicles, facilities, buildings, furnishings or materials.
2. Careless use or abuse of Township equipment, tools, vehicles, facilities, buildings, furnishings or materials.

#### **C. ATTENDANCE**

1. Reporting late for work. (Start of shift, after lunch or required meetings, overtime, etc.)
2. Abuse of time allotted for "break period".
3. Excessive absenteeism.
4. Absent one day without giving proper notice. (Penalty will not apply where satisfactory evidence is given that notification by employee or someone else was not possible.)
5. Abuse of paid or unpaid sick leave time.
6. Absent without just cause.
7. Leaving work without permission.
8. Failure to provide required documentation explaining absences.

#### **D. PUBLIC EMPLOYEE RESPONSIBILITIES**

1. Improper grooming or appearance.
2. Failure to wear uniform supplied by the Township.
3. Wearing improper apparel on the job.
4. Discourtesy or improper conduct in dealing with the public or other employees.
5. Falsifying records or reports.
6. Unsatisfactory performance
7. Negligence
8. Refusal to work overtime.

\*Impairment may require reassignment to another job or layoff until another job is available.

**E. CONDUCT**

1. Gambling
2. Horseplay
3. Interfering with fellow employees or supervisors.
4. Insubordinate conduct or failure to follow orders.
5. Sleeping during working hours.
6. Unfit condition for work.
7. Solicitations or conducting personal business without permission during working hours.
8. Neglect of job, duties or responsibilities or loafing.
9. Failure to follow work routines or work priorities as designated or instructed.

These rules are not intended to be all inclusive of the required standards of conduct and obligations of employees under the Collective Bargaining Agreement. These Rules and Regulations may be supplemented by other Township policies or directives and by provisions in the Collective Bargaining Agreement.

The Township shall, when it deems it necessary, establish additional rules and regulations. Department Heads may establish particular rules and regulations governing its employees that are deemed necessary for department operational requirements. Employees are required to obey those rules and they are subject to the same application and standards as these Uniform Rules and Regulations.

Approved by Township Board April 26, 1993

## *APPENDIX II*

### *DEFINITIONS AND STANDARDS*

#### Definition of “blighted structure” in context of state or local law.

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 blighted structure shall be any structure, in accordance with Waterford Code of Ordinances Chapter 4, Article V, Section 4-154, that becomes a blighting problem or adversely affects the public health or safety or becomes a public nuisance. A public nuisance shall include the following conditions:

- The physical condition, or occupancy of any premises regarded as a public nuisance at common law;
- Any physical condition, or occupancy of any premises or its appurtenances considered an attractive nuisance to children, including, but not limited to, abandoned wells, shafts, basements, excavations and unsafe fences or structures;
- Any premises that has unsanitary sewerage or plumbing facilities;
- Any premises designated as unsafe for human habitation or use;
- Any premises which is manifestly capable of being a fire hazard, or is manifestly unsafe or unsecured so to endanger life, limb or property;
- Any premises from which the plumbing, heating or facilities required by this code have been removed, or from which utilities have been disconnected, destroyed, removed or rendered ineffective, or the required precautions against trespassers have not been provided;
- Any premises which is unsanitary, or which is littered with rubbish or garbage, or that has an uncontrolled growth of weeds, or;
- Any structure that is in a state of dilapidation, deterioration or decay; faulty construction; overcrowded; open, vacant or abandoned; damaged by fire to the provide shelter, in danger of collapse or failure; and dangerous to anyone on or near the premises.

#### Definition of “affordable rents.”

At the present time the Township does not propose undertaking any activities that will produce units of rental housing. If the Township did revise its action plan to undertake such an activity, the units produced would be required to be leased at or below fair market rent (FMR) – The monthly rent, including the cost of utilities (except telephone), as established by HUD for units of varying sizes (by number of bedrooms), that must be paid in the housing market area to rent privately owned, existing, decent, safe and sanitary rental housing of modest (non-luxury) nature with suitable amenities.

#### Describe housing rehabilitation standards that will apply to NSP2 assisted activities.

##### Response:

All housing construction funded with NSP2 funds shall meet the accessibility standards at 24CFR part 8 and will be energy efficient and incorporate cost effective green improvements. A description of your housing rehabilitation standards, which must include requiring that NSP2 housing construction must meet the accessibility standards at 24 CFR part 8, and that it be energy efficient and incorporate cost effective green improvements. Although the Township is not proposing gut rehabilitation of residential buildings up to three stories, any such rehabilitation shall be designed to meet the standard for Energy Star Qualified New Homes.

Although the Township is not proposing gut rehabilitation of mid -or high-rise multifamily housing, all such gut rehabilitation must be designed to meet American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Standard 90.1-2004, Appendix G plus 20 percent (which is the Energy Star standard for multifamily buildings piloted by the Environmental Protection Agency and the Department of Energy). Other rehabilitation shall meet these standards to the extent applicable to the rehabilitation work undertaken, e.g., replace older obsolete products and appliances (such as windows, doors, lighting, hot water heaters, furnaces, boilers, air conditioning units, refrigerators, clothes washers and dishwashers) with Energy Star-labeled products. Water- efficient toilets, showers, and faucets, such as those with the WaterSense label, must be installed. Where relevant, the housing should be improved to mitigate the impact of disasters (e.g., earthquake, hurricane, flooding, fires). All homebuyer assistance funds used in connection with the FHA streamlined 203(k) program for rehabilitation work will require that such work be brought into compliance with the Michigan Rehabilitation Code for Existing Buildings.

### **Other Definitions.**

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

*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 the appraisal requirements of the Uniform Relocation Act (URA) at 49 CFR 24.103 and completed within 60 days prior to an offer made for the property by the Township, subrecipient, developer, or individual homebuyer; provided, 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 recipient determines is qualified to make the valuation.

*Foreclosed* – A property “has been foreclosed upon” at the point that, under state or local law, the mortgage or tax foreclosure is complete. HUD generally will not consider a foreclosure to be complete until after the title for the property has been transferred from the former homeowner under some type of foreclosure proceeding or transfer in lieu of foreclosure, in accordance with state or local law.

## *APPENDIX III*

### *CITIZEN PARTICIPATION*

On July 7, 2009, notice was posted on the official Waterford Township website, [www.twp.waterford.mi.us](http://www.twp.waterford.mi.us), that the Township would be submitting an application for Neighborhood Stabilization 2 funds provided under the American Reinvestment and Recovery Act of 2009. On the main page of the Township's website, there is a link identified as Waterford's Recovery Act Efforts and includes the official Recovery Act logo. This link provides the direction to the Township's NSP2 description of the proposed target geography, proposed uses of NSP2 funds in sufficient detail for affected citizens to understand how they may be affected, and requested comments from the public. The Township also notified the public of its intent to apply for NSP2 funds through notification and passage of a resolution by the Township Board at their July 13, 2009 meeting. Finally, the Township also published a legal notice in the July 14, 2009 edition of the Oakland Press indicating that the Township would be submitting an NSP2 application and described the proposed target geography, proposed uses of NSP2 funds in sufficient detail for affected citizens to understand how they may be affected, and requested comments from the public.

No public comments, for or against, were received.

## ***APPENDIX IV CERTIFICATIONS***

### **State and Unit of Local Government Certifications**

Each NSP2 **state or unit of local government** applicant will submit the following certifications:

1. Affirmatively furthering fair housing. The applicant certifies that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
2. Anti-displacement and relocation plan. The applicant certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.
3. Anti-lobbying. The applicant must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
4. Authority of applicant. The applicant certifies that it 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. Acquisition and relocation. The applicant 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 NSP2 program published by HUD.
6. Section 3. The applicant certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
7. Citizen participation. The applicant certifies that it is carrying out citizen participation in accordance with NSP2 requirements.
8. Use of funds. The jurisdiction certifies that it will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008, as modified by the American Reinvestment and Recovery Act by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.
9. The applicant certifies:
  - a. that all of the NSP2 funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income; and
  - b. The applicant will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low-and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect

- to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.
10. Excessive force. The applicant, if an applicable governmental entity, certifies that it has adopted and is enforcing:
    - a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
    - b. A policy of enforcing applicable state and local laws against physically barring entrance to, or exit from, a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
  11. Compliance with anti-discrimination laws. The applicant certifies that the NSP grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.
  12. Compliance with lead-based paint procedures. The applicant certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
  13. Compliance with laws. The applicant certifies that it will comply with applicable laws.



Signature/Authorized Official

7-14-09

Date

Carl W. Solden

Township Supervisor  
Title