NSP GRANT SUBMISSION TEMPLATE & CHECKLIST

NSP grant allocations can be requested by submitting a paper NSP Substantial Amendment or a form under the Disaster Recovery Grant Reporting (DRGR) system. This template sets forth the suggested format for grantees under the NSP Program. A complete submission contains the information requested below, including:

(1) The NSP Substantial Amendment (attached below)
(2) Signed and Dated Certifications (attached below)
(3) Signed and Dated SF-424.

Grantees should also attach a completed NSP Substantial Amendment Checklist to ensure completeness and efficiency of review (attached below).

THE NSP SUBSTANTIAL AMENDMENT

Jurisdiction(s): Hamilton County, IN_ *(identify lead entity in case of joint agreements)* Jurisdiction Web Address: www.co.hamilton.in.us	NSP Contact Person: Mark McConaghy Address: 320 Kings Lane Noblesville, IN 46060 Telephone: (317) 773-5110, ext. 104 Fax: (317) 774-0079 Email: markmcconaghy@sbcglobal.net

A. AREAS OF GREATEST NEED

Provide summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction.

Response:

Hamilton County, Indiana, has received $2,343,868 in a special allocation of Community Development Block Grant (CDBG) funds as part of the Neighborhood Stabilization Program developed by U.S. Department of Housing and Urban Development (HUD) to provide targeted emergency assistance to help stabilize neighborhoods and stem the decline of house values of neighboring homes. Hamilton County has been particularly hard hit. According to data provided by the Hamilton County sheriff's office there were 975 foreclosures in 2007 and in the first nine months of 2008 there are 1,210 foreclosures. This represents a 57% increase in one year.

Table 1

Hamilton County, Indiana
Foreclosures by Census Tract for 2007 and 2008*

Block Group Number	Foreclosures 2007	Foreclosures 2008	Total Hshlds	2007 %	2008** %
180571101001	3	3	887	0.34%	0.34%
180571101002	6	9	1,706	0.35%	0.53%
180571101003	47	53	1,314	3.58%	4.03%
180571101004	1	3	1,074	0.09%	0.28%
180571102011	10	6	879	1.14%	0.68%
180571102012	8	4	1,194	0.67%	0.34%
180571102013	4	15	1,245	0.32%	1.20%
180571102014	8	4	1,120	0.71%	0.36%
180571102021	13	21	3,486	0.37%	0.60%
180571102022	3	4	819	0.37%	0.49%
180571102023	6	7	955	0.63%	0.73%
180571103001	4	5	1,042	0.38%	0.48%
180571103002	8	11	1,507	0.53%	0.73%
180571103003	7	12	792	0.88%	1.52%

180571103004	13	9	1,276	1.02%	0.71%
180571103005	2	4	1,219	0.16%	0.33%
180571103006	8	24	1,306	0.61%	1.84%
180571104001	9	9	2,205	0.41%	0.41%
180571104002	4	6	785	0.51%	0.76%
180571104003	50	38	3,102	1.61%	1.23%
180571104004	14	28	2,954	0.47%	0.95%
180571105021	6	7	4,128	0.15%	0.17%
180571105022	15	32	2,778	0.54%	1.15%
180571105023	18	20	1,959	0.92%	1.02%
180571105024	29	32	2,705	1.07%	1.18%
180571105025	2	3	1,217	0.16%	0.25%
180571105031	61	108	5,229	1.17%	2.07%
180571105032	23	39	2,917	0.79%	1.34%
180571105041	28	45	4,709	0.59%	0.96%
180571105042	36	34	3,473	1.04%	0.98%
180571106001	17	14	2,931	0.58%	0.48%
180571106002	5	2	1,478	0.34%	0.14%
180571107001	10	14	1,546	0.65%	0.91%
180571107002	16	18	1,598	1.00%	1.13%
180571107003	6	8	682	0.88%	1.17%
180571108011	70	86	3,377	2.07%	2.55%
180571108012	131	172	13,702	0.96%	1.26%
180571108021	16	20	3,384	0.47%	0.59%
180571108022	3	9	2,045	0.15%	0.44%
180571108023	3	7	3,785	0.08%	0.18%
180571108024	18	13	4,259	0.42%	0.31%
180571108031	20	20	5,661	0.35%	0.35%
180571108032	9	8	2,288	0.39%	0.35%
180571108033	1	8	1,479	0.07%	0.54%
180571108034	14	14	3,431	0.41%	0.41%
180571108035	2	4	1,927	0.10%	0.21%
180571109011	24	17	8,902	0.27%	0.19%
180571109012	6	7	3,815	0.16%	0.18%
180571109013	4	5	2,575	0.16%	0.19%
180571109021	1	0	1,282	0.08%	0.00%
180571109022	5	5	1,732	0.29%	0.29%
180571109023	13	23	6,853	0.19%	0.34%
180571109024	3	6	2,519	0.12%	0.24%
180571110011	6	11	2,422	0.25%	0.45%
180571110012	2	0	1,595	0.13%	0.00%
180571110013	2	18	2,684	0.07%	0.67%
180571110031	6	5	1,512	0.40%	0.33%
180571110032	3	3	1,954	0.15%	0.15%
180571110033	1	2	1,284	0.08%	0.16%
180571110041	3	0	1,305	0.23%	0.00%
180571110042	1	5	1,773	0.06%	0.28%
180571110051	4	8	1,428	0.28%	0.56%

180571110052	0	0	2,678	0.00%	0.00%
180571110053	2	6	1,620	0.12%	0.37%
180571110054	1	5	1,190	0.08%	0.42%
180571110061	6	10	1,405	0.43%	0.71%
180571110062	12	21	2,726	0.44%	0.77%
180571111011	2	5	3,815	0.05%	0.13%
180571111021	3	4	1,538	0.20%	0.26%
180571111022	15	12	1,662	0.90%	0.72%
180571111023	3	3	883	0.34%	0.34%
180571111024	10	17	3,540	0.28%	0.48%
Total	925	1210	178,247		

*Data provide by the Hamilton County Sheriff's office
** 2008 data through 9/30/08

There are 72 block groups in Hamilton County. All but 14 have a foreclosure rate of less than 1%. Only one, block group 11010.03 has a foreclosure rate over 4% in 2008. Of the remaining 13, two had foreclosure rates between 2 and 3% and the remaining nine were less than 2%. The census tracts with the highest rates, as well as the highest numbers, were in Noblesville and Fishers, though certain areas of Carmel had a significant number of foreclosures as well.

Table 2
Hamilton County Foreclosures by Community

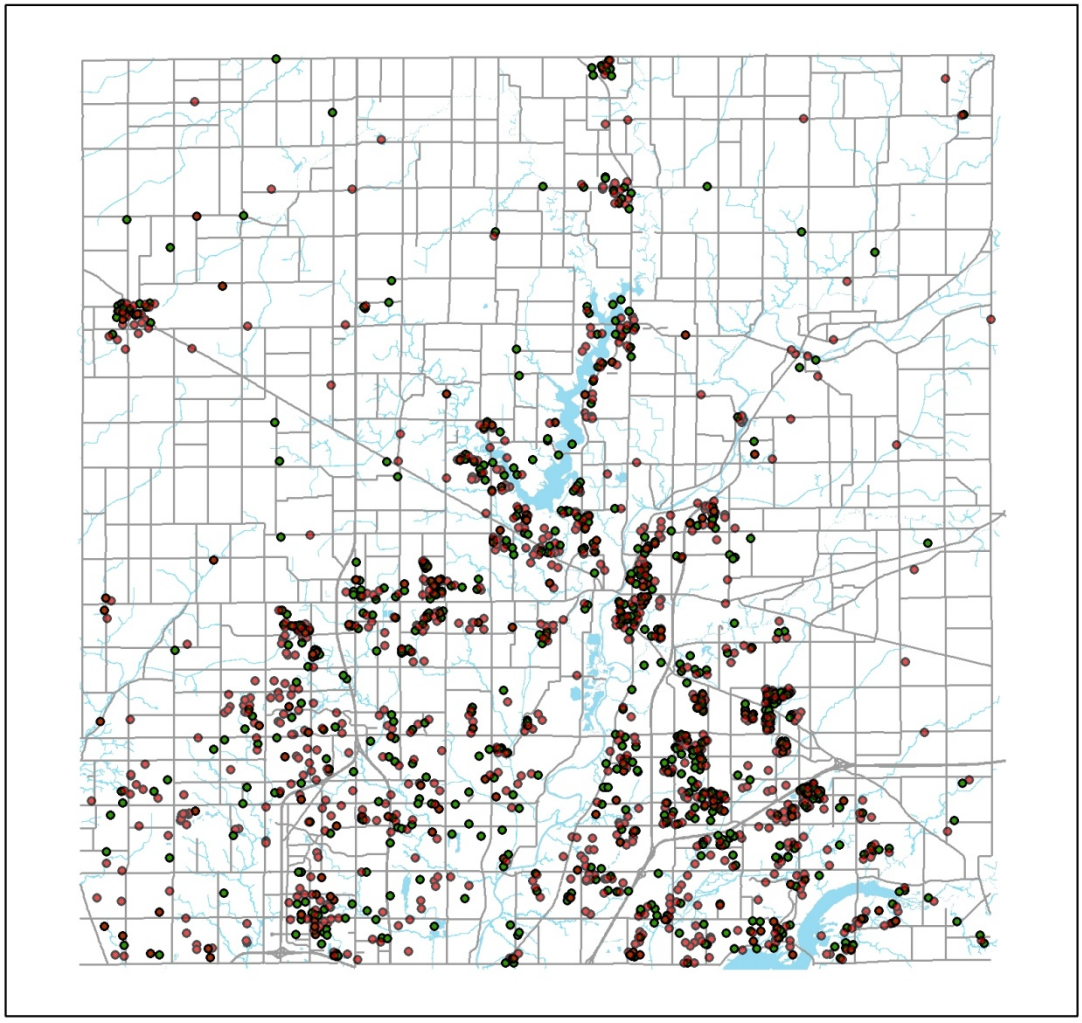
Community	2007	2008	Housing Units**	%
Arcadia	7	21	607	4.61%
Atlanta	14	8	283	7.77%
Carmel	120	174	14,107	2.08%
Cicero	28	32	1,811	3.31%
Fishers	188	267	15,241	2.99%
Fortville*	14	16	NA	NA
Indianapolis*	45	53	NA	NA
McCordsville*	10	8	NA	NA
Noblesville	378	443	11,294	7.27%
Sheridan	33	41	988	7.49%
Westfield	106	108	3,606	5.93%
Zionsville*	4	5	NA	NA
Total	947	1176		

*Hamilton County data not available, **2000 data

Table 2 shows the 2007 and 2008 foreclosures by community address. Noblesville, Atlanta and Sheridan have the highest percentage of foreclosed properties in Hamilton County. While Hamilton County can spend NSP funding in Noblesville; the communities of Atlanta, Sheridan and Arcadia will need to pursue state of Indiana NSP funding.

Map 1.

Hamilton County
Foreclosures
2007 & 2008



Legend

- 2008Foreclosed Homes
- 2007 Foreclosed Homes

Source: Hamilton County Government and US Census Bureau.
Map Created: October 15, 2008

0 5,500 11,000 22,000 33,000 44,000 Feet

The above graphic (Map 1), shows each foreclosed property from 2007 through September or 2008. The map demonstrates a broad dispersion across the southern half of the county in addition to concentrations in each of the northern communities.

Table 3
Hamilton County Housing Starts by Year

Year	# starts	% change
2008*	1295	-31%
2007	2412	-13%
2006	2788	-23%
2005	3608	-3%
2004	3731	2%
2003	3655	5%
2002	3466	-8%
2001	3772	7%
2000	3509	-8%
1999	3802	

*data through 10/31/08

Table 3 illustrates not only the tremendous number of new housing units constructed over the past eight years in Hamilton County but also demonstrates the drastic reduction in the number of units being built over the past few years. The sheer number of foreclosures in past few years have impacted the market and prevented builders from constructing new housing in an area that continues to grow in population.

As demonstrated in the above map and tables, the foreclosures in Hamilton County are widely dispersed across the southern half of Hamilton County roughly in the form of a triangle or half circle. With this broad dispersion across many neighborhoods and most communities it is imperative that the county provide access to NSP funds to communities most impacted by the foreclosure crisis. Noblesville has experienced 821 foreclosures or 7.25% of the total housing stack in the past two years. Carmel, Fishers and Westfield have experienced 294 units (2.08%), 455 units (2.99%) and 214 units (5.93%) respectively. This accounts for almost 1,800 units, or 83.5% of all foreclosures in Hamilton County in the past two years.

Sheridan, Atlanta and Arcadia have also experienced significant foreclosure rates. Sheridan has experienced 74 foreclosures, or 7.49% of their total housing stock. Areas surrounding these communities in Adams and Jackson township have also experienced distress. Since these communities are not participating in the Hamilton County CDBG program the county recommends that they participate in the state of Indiana NSP program however, the county will serve the townships outside of the municipal boundaries.

HUD has provided an estimated foreclosure risk factor[1] to assist jurisdictions in determining the areas of greatest need. HUD provided scores from one to ten with one being the lowest risk and ten being the highest risk. These scores as well as the other factors HUD used to determine need can be found in Attachment A, "Hamilton County Neighborhood Stabilization Program-Census Data". The older sections of Noblesville was found to have the highest risk then the risk dropped dramatically. This also held true for the predicted 18 month foreclosure rate and the highest percentage of homes financed by sub-prime mortgages.

Based upon the above information as well as data provided by HUD, the county will target NSP funds as shown in "Attachment B". Attachment B shows the census tracts and block groups that have been identified as high medium and low priorities. The factors that went into considering our priority areas are areas of greatest percentage of foreclosures, the areas with the greatest percentage of foreclosures, the areas with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures as identified in the data in Attachment A. The county expects to expend approximately 60% of available funding in High priority area, 40% of available NSP funds in Medium Priority area and no funding in low priority areas. These high and Medium Priority areas do not include the entire county. Areas that were considered low priority can be found in the communities of Carmel, Fishers and Noblesville and the townships of Clay, Delaware and Wayne.

B. DISTRIBUTION AND USES OF FUNDS

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

Response:

The county will distribute NSP funds to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed with sub-prime mortgage loans, identified by the county as likely to face a significant rise in the rate of home foreclosures, and areas with high foreclosure rates based on data from the Hamilton County Sheriff's office. Accordingly, the county will meet the requirements set forth in section 2301(c)(2) of HERA when expending NSP funds. As reference, staff considered the following criteria in assessing areas of distress.

[1] HUD developed its risk score using factors that include decline in home values, unemployment rates, rate of high cost loans (i.e. interest rates 3 percentage points above the Treasury rate), foreclosure start rates, and vacant property rates (using U.S. Postal Service reports of homes that are vacant for over 90 days).

They looked at census tracts that had an estimated foreclosure/abandonment risk score of at least 4, a HMDA hi-cost loan rate of at least 15%, an 18 month underlying problem foreclosure rate of at least 3% and a USPS vacancy rate of at least 3%. These criteria were selected and combined with data collected locally through the county and other sources.

As discussed in Section A, old Noblesville (census tracts 110700,110600 and 110504) generally is the most distressed area using the indicators discussed above. The HUD data also indicates that Arcadia, Atlanta and Sheridan also exhibit distressed conditions. In addition, many areas in Fishers, Carmel, Westfield and Cicero exhibited significant distress factors. Attachment B shows the priority rating for each Census Tract/Block Group in Hamilton County. Areas that were considered low priority can be found in the communities of Carmel, Fishers and Noblesville and the townships of Clay, Delaware and Wayne.

Most of the activities eligible under the NSP represent a subset of the eligible activities under the traditional CDBG program. Certain CDBG eligible activities correlate to specific NSP activities and vice versa. The County will ensure that 100% of the NSP funds will be used to benefit individuals and households with incomes below 120% of the area median income (AMI). In addition, at least 25% of the NSP funds will be used to benefit individuals and families earning less than 50% of the area median income.

Hamilton County developed specific housing programs to benefit very low (households of less than 50% of AMI, and the low, moderate, and middle income (households between 51 and 120% of AMI). Section G, Information by Activity, gives additional detail on each of the proposed NSP activities.

C. DEFINITIONS AND DESCRIPTIONS

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

Response:

Blighted structures — The County will rely upon Indiana Code IC 36-7-9-4.5 in order to determine blight. A blighted structure will include, but is not limited to the following:

a. Vacant structures often become dilapidated because the structures are not maintained and repaired by the owners or persons in control of the structures.
b. Vacant structures that attract children, become harborage for vermin, serve as temporary abodes for vagrants and criminals, and are likely to be damaged by vandals or set ablaze by arsonists.
c. Unkept grounds surrounding vacant structures invite dumping of garbage, trash, and other debris.
d. Vacant, deteriorated structures contribute to blight, cause a decrease in property values, and discourage neighbors from making improvements to properties.
e. Structures that remain boarded up for an extended period of time also exert a blighting influence and contribute to the decline of the neighborhood by decreasing property values, discouraging persons from moving into the neighborhood, and

encouraging persons to move out of the neighborhood.

Other definitions:

Abandoned property — a property in which the mortgage or tax foreclosure process has been initiated for the property and no mortgage or tax payments have been made in 90 days and the property has been vacant for 90 days.

Current market appraised value — the value of a foreclosed home established through an appraisal made in conformity with the requirements of the URA (at 49 CFR 24.103) and complete within 60 days prior to an offer to purchase.

Foreclosed property — a property that is at the point, as defined by state or local law, where the mortgage or the tax foreclosure is complete and the title for the property has been transferred under a foreclosure proceeding or a transfer in lieu of foreclosure.

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

Response:

The NSP will follow the FY09 Fair Market Rents (FMR) for Hamilton County, Indiana

The following table shows the Final FY 2009 FMRs by unit bedrooms. The FMRs for units with different numbers of bedrooms are computed from the ratio of the 2005 Revised Final FMRs (based on 2000 Decennial Census Data) for the different unit sizes to the 2005 2-Bedroom Revised Final FMRs. These Rent Ratios are applied to the Final FY 2009 2-Bedroom FMR to determine the Final FY 2009 FMRs for the different size units.

Final FY 2009 FMRs By Unit Bedrooms

	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2009 FMR	$542	$627	$745	$964	$1,020

The FMRs for unit sizes larger than four bedrooms are calculated by adding 15 percent to the four bedroom FMR, for each extra bedroom. For example, the FMR for a five bedroom unit is 1.15 times the four bedroom FMR, and the FMR for a six bedroom unit is 1.30 times the four bedroom FMR. FMRs for single-room occupancy units are 0.75 times the zero bedroom (efficiency) FMR.

Periods of affordability

The NSP assisted units will follow the HOME regulations regarding the period of affordability.

The following affordability periods apply to ALL NSP funded projects, including rental and homebuyer housing:

Amount of NSP subsidy per unit	**Affordability Period**
Under $15,000 per unit	5 years
$15,000 - $40,000 per unit	10 years
Over $40,000 per unit – or – any rehabilitation/refinance combination activity	15 years
New Construction or acquisition of newly constructed permanent rental housing	20 years

For rental properties, the NSP assisted units must remain affordable for no less than the applicable period specified in the above table. The affordability requirements apply without regard to the term of any loan or mortgage or the transfer of ownership.

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

Response:

The length of the affordability period will be based on the amount of assistance received.

If the assistance is less than $15,000 per unit, the affordability period will be five (5) years. If the assistance is $15,000 to $40,000, the affordability period will be ten (10) years. If the assistance is over $40,000, the affordability period will be twenty (20) years.

The affordability requirements will be monitored through annual monitoring and enforced through deed restrictions.

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

Response:
As a result of the financial assistance under this program, and before other types of improvements may be made, any area or system of the house where NSP funds are spent must be raised to meet the State of Indiana Rehabilitation Standards.

D. LOW INCOME TARGETING

Identify the estimated amount of funds appropriated or otherwise made available under the NSP to be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income: $585,967.

Note: At least 25% of funds must be used for housing individuals and families whose incomes do not exceed 50 percent of area median income.

Response:
The county intends to expend at least 25% or $585,967 of its NSP funds to provide affordable housing, as well as to purchase and redevelop abandoned or foreclosed residential homes or properties to house individuals or families with incomes up to 50% of the AMI.

E. *ACQUISITIONS & RELOCATION*

Indicate whether grantee intends to demolish or convert any low- and moderate-income dwelling units (i.e., ≤ 80% of area median income).

If so, include:

- **The number of low- and moderate-income dwelling units—i.e., ≤ 80% of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.**
- **The number of NSP affordable housing units made available to low- , moderate-, and middle-income households—i.e., ≤ 120% of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).**
- **The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.**

Response:
It is not the intent of this program to provide NSP funding to demolish or convert any low and moderate income dwelling units. There is no documentation or evidence that there is a significant amount of foreclosed residential properties in need of demolition. All properties purchased with NSP funds must be vacant at the time of sale and must have been vacant since the foreclosure was finalized.

F. PUBLIC COMMENT

Provide a summary of public comments received to the proposed NSP Substantial Amendment.

Response:
Per the NSP guidelines, a notice of public hearing was published in a newspaper of general circulation. The notice indicated that the 15 day public comment period would commence on November 7, 2008 and end November 22, 2008. As required, the county

posted the proposed NSP Substantial Amendment on the county web-site for 15 days prior to the public hearing, making it available for public review.

- No public comments were received. However, staff recognized an error in the budget for activity 1 (NSP-1). $35,000 was added back into this activity that staff had initially set aside for a Homebuyer Counseling activity that was rolled in to NSP-1. This activity is now correctly budgeted in the amount of $1,298,515.

G. *NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)*

(1) Activity Name: DOWNPAYMENT ASSISTANCE TO BUYERS OF FORECLOSED PROPERTIES (NSP-1)

(2) Activity Type:

NSP-1: NSP Eligible Uses
Establish financing mechanisms for purchase and redevelopment of foreclosed homes and residential properties (HERA, 2301 (c)(A))
NSP-1: CDBG Eligible Uses
Direct Home Ownership Assistance (24 CFR 570.201 (n))

(3) National Objective: Benefiting low, moderate and middle income persons, as defined in the NSP notice. More specifically the program is expected to benefit primarily low, moderate and middle income (51% to 120% of AMI) purchaser-occupants, but will also benefit some very low (50% and below AMI).

(4) Projected Start Date: December 2008/January 2009 (from receipt of grant)

(5) Projected End Date: September 2010 (18 months)

(6) Responsible Organization: Noblesville Housing Authority, 320 Kings Lane, Noblesville, IN 46060. Mark McConaghy, CDBG Coordinator, (317) 773-5110, extension 104.

(7) Location Description: Eligibility will be limited to properties in high and medium census tracts as describe in Attachment B.

(8) Activity Description: The purpose of the program is to assist eligible homebuyers to quickly purchase and occupy a foreclosed single family homes before vandalism and blight become acute. The County would make conditional second mortgage loans to purchaser-occupants via the following guidelines:

- Available to **owner-occupied home buyers** (no investors).
- Hamilton County will coordinate with lenders, mortgage servicers, Fannie Mae, Freddie Mac, and HUD to identify foreclosed properties. Lenders will be required to sell the properties listed at a discount. The NSP Federal Register Notice addresses purchase discounts of 1 percent (individual purchase) and aggregate purchases.
- **Hamilton County will offer up to $30,000 (not to exceed 20 percent of the purchase price) in down payment assistance** (as a second mortgage loan) and closing costs to buyers who purchase listed homes. This assistance may be used in conjunction with the IHCDA First Home mortgage product, FHA, VA, or prime fixed-rate mortgage. No adjustable rate or subprime mortgages will be allowed.

- All buyers must **complete 8 hours of pre-purchase homeownership counseling** from an approved counselor.
- **Buyers' incomes must be at or below 120 percent of Area Median Income** (AMI).

NSP-1: Housing Related Activities	
Tenure of Beneficiaries	Homeownership (minimum of 5 years)
Duration or term of assistance	One time 5 or 10 year lien on property
A description of how the design of the activity will ensure continued affordability	The affordability period will remain in effect for 5 to 10 years depending upon the NSP subsidy amount. Affordability will be enforced through annual monitoring and deed restrictions.
NSP-1: Acquisition Activities	
Discount Rate	Average 1% as set forth in Section 2301(c)(d)(1) of HERA and described in Section Q of HUD docket No. FR-5255-N-01.
NSP-1: Financing Activities	
Range of Interest Rates	Conditional second mortgages loan at 0% interest.

I. Total Budget: Hamilton County NSP funding: $ 413,216
Other funds: $1,000,000

We anticipate that 60% of the funds will go to high priority areas and 40% will go to medium priority areas of the county.

J. Performance Measures :

NSP-1: Number of assisted units	
Below 50% AMI	1
51-120% AMI	15
Total	16

G. *NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)*

(1) Activity Name: ACQUISTION OF FORECLOSED OR ABANDONED RESIDENTIAL PROPERTY FOR REHABILITATON AND RE-SALE OR RENTAL HOUSING

(2) Activity Type:

NSP-2: NSP Eligible Uses
Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon in order to sell, rent, or redevelop such homes and properties. (HERA, 2301 (c)(3)(B))
NSP-2: CDBG Eligible Uses
24 CFR 570.201 (a): Acquisition, 201(b) Disposition, 202 Eligible rehabilitation and preservation Activities for homes and other residential properties

(3) National Objective: Benefiting low, moderate and middle income persons, as defined in the NSP notice. The NSP-2 program is expected to also benefit households at or below 50% of the AMI.

(4) Projected Start Date: December 2008/January 2009 (from receipt of grant)

(5) Projected End Date: December 2012/January 2013 (4 years)

(6) Responsible Organization: Noblesville Housing Authority, 320 Kings Lane, Noblesville, IN 46060. Mark McConaghy, CDBG Coordinator, (317) 773-5110, extension 104.

(7) Location Description: Eligibility will be limited to properties in high and medium census tracts as describe in Attachment B.

(8) Activity Description: The purpose of the NSP-2 program is to purchase (and rehabilitate as necessary) foreclosed or abandoned residential property for rehabilitation and re-sale or rental. The County would use NSP funds to purchase and rehabilitate foreclosed or abandoned single and multi family residences for resale and use as rental properties. Properties could be purchased for the Noblesville Housing Authority's own portfolio or the county could assist non-profit partners in acquisition and rehabilitation. This would be the county's primary program for benefiting households at or below 50% of the area median income. Deed restrictions of up to15 years would be recorded to ensure long term affordability (see Section C-3).

NSP-2: Housing Related Activities	
Tenure of Beneficiaries	Homeownership (minimum 5 years) Rentals, but with affordability covenants up to 15 years.
Duration or term of assistance	One time 5 or 10 year lien on property. Up to 15 year subordinate loan or grant.
A description of how the design of the activity will ensure continued affordability	The affordability period will remain in effect for 5 to 15 years depending upon the NSP subsidy amount. Affordability will be enforced through annual monitoring and deed restrictions.
NSP-2: Acquisition Activities	
Discount Rate	Average 1% as set forth in Section 2301(c)(d)(1) of HERA and described in Section Q of HUD docket No. FR-5255-N-01.
NSP-2: Financing Activities	
Range of Interest Rates	0%, but deferred payment so as to maximize leverage for first mortgage as well as minimize rents.

I. Total Budget: Hamilton County NSP funding: $651,189
Other funds: $ 0

J. Performance Measures :

NSP-2: Number of assisted units	
Below 50% AMI	5
51-120% AMI	0
Total	5

G. *NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)*

(1) Activity Name: Redevelop demolished or vacant properties

(2) Activity Type:

NSP-3: NSP Eligible Uses
Redevelop demolished or vacant properties (HERA, 2301 (c)(3)(E))
NSP-3: CDBG Eligible Uses
24 CFR 570.201 (a): Acquisition, 201(b) Disposition, 202 Eligible rehabilitation and preservation Activities for homes and other residential properties

(3) National Objective: Benefiting low, moderate and middle income persons, as defined in the NSP notice. The NSP-3 program is expected to primarily benefit households at or below 120% of the AMI.

(4) Projected Start Date: December 2008/January 2009 (from receipt of grant)

(5) Projected End Date: December 2012/January 2013 (4 years)

(6) Responsible Organization: Noblesville Housing Authority, 320 Kings Lane, Noblesville, IN 46060. Mark McConaghy, CDBG Coordinator, (317) 773-5110, extension 104.

(7) Location Description: Eligibility will be limited to properties in high and medium census tracts as describe in Attachment B.

(8) Activity Description: The purpose of the NSP-3 program is to redevelop demolished or vacant properties for rental to primarily benefit households at or below 120% of AMI though priority will be given to projects that benefit households earning 50% AMI or less. The County would use NSP funds to redevelop demolished or vacant properties for the construction of affordable rental properties. The form of the county's assistance would be a grant or subordinated mortgage. The county would make every effort to leverage these investments, loan and/or grants with FHA or other first mortgages. This program will benefit households at or below 120% of the area median income. Deed restrictions will be put in place that ensures continued affordability that is consistent with sections C2 and C3 of this document. This activity could also result in the development of commercial space in a distressed area.

NSP-3: Housing Related Activities	
Tenure of Beneficiaries	Rentals
Duration or term of assistance	15 year subordinate loan or grant
A description of how the design of the activity will ensure continued affordability	The affordability period will remain in effect for 5 to 20 years depending upon the NSP subsidy amount (see table C-2). Affordability will be enforced through annual monitoring and deed restrictions.
NSP-3: Acquisition Activities	
Discount Rate	Average 15% as set forth in Section 2301(c)(d)(1) of HERA and described in Section Q of HUD docket No. FR-5255-N-01.
NSP-3: Financing Activities	
Range of Interest Rates	0%, but deferred payment so as to maximize leverage for first mortgage as well as minimize rents.

I. Total Budget: Hamilton County NSP funding: $1,175,077
Other funds: $ 0

J. Performance Measures :

NSP-3: Number of assisted units	
0 – 50%	4
51 – 80%AMI	0
81-120% AMI	0
Total	4

G. *NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)*

(1) Activity Name: NSP PLANNING AND ADMINISTRATION

(2) Activity Type: An amount of up to 10 percent of an NSP grant provided to a jurisdiction and up to 10 percent of program income earned may be used for general administration and planning activities as defined at 24 CFR 570.205 and 206.

Activity delivery costs, as defined in 24 CFR 570.206, may be charged to the particular activity performed above and will not count as general administration and planning costs.

Pre-award Costs: A grantee may incur pre-award costs necessary to develop the NSP Application and undertake other administrative and planning actions necessary to receive the NSP grant, in compliance with 24 CFR 570.200(h). States may allow subrecipients to incur pre-award costs pursuant to 24 CFR 570.489(h).

(3) National Objective: NA

(4) Projected Start Date: October 2008

(5) Projected End Date: December 2012/January 2013 (4 years)

(6) Responsible Organization: Noblesville Housing Authority, 320 Kings Lane, Noblesville, IN 46060. Mark McConaghy, CDBG Coordinator, (317) 773-5110, extension 104.

(7) Location Description: Countywide excluding the communities of Arcadia, Atlanta and Sheridan because they have opted out of the County CDBG program. Participants will select properties in the county's identified high and medium risk areas.

(8) Activity Description: Planning and administrative work will include all tasks associated with the development and publication of the NSP Substantial Amendment. Activity development and related legal documents will also be covered by the planning and administration budget. Staff will make every effort to limit planning and administrative costs so that additional funds can be used for program implementation.

I. Total Budget: Hamilton County NSP funding: $104,386

J. Performance Measures : NA

CERTIFICATIONS

(1) **Affirmatively furthering fair housing**. The jurisdiction will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.

(2) **Anti-lobbying**. The jurisdiction will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.

(3) **Authority of Jurisdiction**. The jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.

(4) **Consistency with Plan**. The housing activities to be undertaken with NSP funds are consistent with its consolidated plan, which means that NSP funds will be used to meet the congressionally identified needs of abandoned and foreclosed homes in the targeted area set forth in the grantee's substantial amendment.

(5) **Acquisition and relocation**. The jurisdiction will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the Notice for the NSP program published by HUD.

(6) **Section 3**. The jurisdiction will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.

(7) **Citizen Participation**. The jurisdiction is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.

(8) **Following Plan**. The jurisdiction is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

(9) **Use of funds in 18 months**. The jurisdiction will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008 by using, as defined in the NSP Notice, all of its grant funds within 18 months of receipt of the grant.

(10) **Use NSP funds ≤ 120 of AMI**. The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.

(11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by

assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

(12) **Excessive Force**. The jurisdiction certifies that it has adopted and is enforcing: (1) a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and (2) a policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.

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

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

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

_____ _____
Signature/Authorized Official Date

President, Hamilton County Commissioners
Title

NSP Substantial Amendment Checklist

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

Contents of an NSP Action Plan Substantial Amendment

Jurisdiction(s): Hamilton County, IN Lead Agency: Noblesville Housing Authority Jurisdiction Web Address: www.co.hamilton.in.us/ *(URL where NSP Substantial Amendment materials are posted)*	NSP Contact Person: Mark McConaghy Address: 320 Kings Lane Noblesville, IN 46060 Telephone: (317) 773-5110, ext. 104 Fax: (317) 774-0079 Email: markmcconaghy@sbcglobal.net

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

A. Areas of Greatest Need

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

Yes☒ No☐. Verification found on page 1-6.

B. Distribution and Uses of Funds

Does the submission contain a narrative describing how the distribution and uses of the grantee's NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures?

Yes☒ No☐. Verification found on page 6.

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

C. Definitions and Descriptions

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

- a definition of "blighted structure" in the context of state or local law,
  Yes☒ No☐. Verification found on page 7.

- a definition of "affordable rents,"
  Yes☒ No☐. Verification found on page 8.

- a description of how the grantee will ensure continued affordability for NSP assisted housing,
  Yes☒ No☐. Verification found on page 9.

- a description of housing rehabilitation standards that will apply to NSP assisted activities?
  Yes☒ No☐. Verification found on page 10.

D. INFORMATION BY ACTIVITY

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

- eligible use of funds under NSP,
  Yes☒ No☐. Verification found on page 12, 16, 16.

- correlated eligible activity under CDBG,
  Yes☒ No☐. Verification found on page 12, 14, 16.

- the areas of greatest need addressed by the activity or activities,
  Yes☒ No☐. Verification found on page 6.

- expected benefit to income-qualified persons or households or areas,
  Yes☒ No☐. Verification found on page 13, 15, 17.

- appropriate performance measures for the activity,
  Yes☒ No☐. Verification found on page 13, 15, 17.

- amount of funds budgeted for the activity,
  Yes☒ No☐. Verification found on page 13, 15, 17.

- the name location and contact information for the entity that will carry out the activity,
  Yes☒ No☐. Verification found on page 12, 14, 16.

- expected start and end dates of the activity?
  Yes☒ No☐. Verification found on page 12, 14, 16.

E. SPECIFIC ACTIVITY REQUIREMENTS

Does each activity narrative describe the general terms under which assistance will be provided, including:

<u>If the activity includes acquisition of real property</u>,

- the discount required for acquisition of foreclosed upon properties,
  Yes☒ No☐. Verification found on page 13, 15, 17.

If the activity provides financing,

- the range of interest rates (if any),
  Yes☒ No☐. Verification found on page 13, 15, 17.

If the activity provides housing,

- duration or term of assistance,
  Yes☒ No☐. Verification found on page 13, 15, 17.

- tenure of beneficiaries (e.g., rental or homeownership),
  Yes☒ No☐. Verification found on page 13, 15, 17.

- does it ensure continued affordability?
  Yes☒ No☐. Verification found on page 13, 15, 17.

- does the applicant indicate which activities will count toward the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
- Yes☒ No☐. Verification found on page 10 and 14.

F. LOW INCOME TARGETING

- Has the grantee described how it will meet the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
  Yes☒ No☐. Verification found on page 10.

- Has the grantee identified how the estimated amount of funds appropriated or otherwise made available will be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50% of area median income?
  Yes☒ No☐. Verification found on page 10.
  Amount budgeted = $585,967.

G. DEMOLISHMENT OR CONVERSION OF LOW- AND MODERATE-INCOME UNITS

Does grantee plan to demolish or convert any low- and moderate-income dwelling units?

Yes☐ No☒. (If no, continue to next heading)
Verification found on page _____.

Does the substantial amendment include:

- The number of low- and moderate-income dwelling units—i.e., ≤ 80% of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities?
  Yes☒ No☐. Verification found on page 10.

- The number of NSP affordable housing units made available to low- , moderate-, and middle-income households—i.e., ≤ 120% of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion)?
  Yes☒ No☐. Verification found on page 10.

- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income?
  Yes☒ No☐. Verification found on page 15.

H. Public Comment Period

Was the proposed action plan amendment published via the grantee jurisdiction's usual methods and on the Internet for no less than 15 calendar days of public comment?

Yes☒ No☐. Verification found on page 11.

Is there a summary of citizen comments included in the final amendment?

Yes☒ No☐ Verification found on page 11.

I. Website Publication

The following Documents are available on the grantee's website:

- SF 424 Yes☒ No☐.
- Proposed NSP Substantial Amendment Yes☒ No☐.
- Final NSP Substantial Amendment Yes☒ No☐.
- Subsequent NSP Amendments Yes☒ No☐.

Website URL: www.co.hamilton.in.us

K. Certifications

The following certifications are complete and accurate:

(1) Affirmatively furthering fair housing Yes☒ No☐
(2) Anti-lobbying Yes☒ No☐
(3) Authority of Jurisdiction Yes☒ No☐
(4) Consistency with Plan Yes☒ No☐
(5) Acquisition and relocation Yes☒ No☐
(6) Section 3 Yes☒ No☐
(7) Citizen Participation Yes☒ No☐

(8) Following Plan	Yes☒	No☐
(9) Use of funds in 18 months	Yes☒	No☐
(10) Use NSP funds ≤ 120 of AMI	Yes☒	No☐
(11) No recovery of capital costs thru special assessments	Yes☒	No☐
(12) Excessive Force	Yes☒	No☐
(13) Compliance with anti-discrimination laws	Yes☒	No☐
(14) Compliance with lead-based paint procedures	Yes☒	No☐
(15) Compliance with laws	Yes☒	No☐

ATTACHMENT A

Hamilton County, Indiana - Neighborhood Stabilization Program

Township	placename	tract	blkgrp	UR	LMMI	Foreclosure/ Abandon risk score	% at 120.0% ami	Persons at 120 AMI	Total Persons	HMDA hi-cost loan rate	predicted 18 month underlying problem foreclosure rate	USPS residential vacancy rate
Noblesville township	**Noblesville city**	**110700**	**2**	**U**	**YES**	**10**	**80.9%**	**1,293**	**1,598**	**34.1%**	**7.9%**	**8.8%**
Noblesville township	**Noblesville city**	**110700**	**3**	**U**	**YES**	**10**	**78.7%**	**537**	**682**	**34.1%**	**7.9%**	**8.8%**
Noblesville township	**Noblesville city**	**110700**	**1**	**U**	**YES**	**10**	**73.8%**	**1,141**	**1,546**	**34.1%**	**7.9%**	**8.8%**
Noblesville township	**Noblesville city**	**110600**	**2**	**U**	**YES**	**8**	**84.9%**	**1,255**	**1,478**	**24.5%**	**5.5%**	**4.5%**
Noblesville township	**Noblesville city**	**110600**	**1**	**U**	**YES**	**8**	**60.5%**	**1,774**	**2,931**	**24.5%**	**5.5%**	**4.5%**
Noblesville township	**Noblesville city**	**110504**	**1**	**R**	**YES**	**6**	**94.6%**	**53**	**56**	**19.8%**	**4.3%**	**1.2%**
Noblesville township	Noblesville city	110504	1	U	NO	6	39.2%	774	1,975	19.8%	4.3%	1.2%
Noblesville township	Noblesville city	110504	2	U	NO	6	19.5%	513	2,628	19.8%	4.3%	1.2%
Noblesville township	Noblesville city	110502	5	U	YES	5	69.2%	693	1,002	16.8%	3.6%	0.5%
Noblesville township		110504	1	U	NO	5	48.9%	670	1,370	19.8%	3.9%	1.2%
Noblesville township		110504	2	U	NO	5	48.6%	252	519	19.8%	3.9%	1.2%
Clay township		111006	2	U	NO	5	43.8%	1,193	2,726	15.5%	2.8%	3.0%
Noblesville township		110504	2	R	NO	5	42.6%	139	326	19.8%	3.9%	1.2%
Noblesville township		110504	1	R	NO	5	38.4%	502	1,308	19.8%	3.9%	1.2%
Noblesville township	Noblesville city	110502	1	U	NO	5	36.2%	1,496	4,128	16.8%	3.6%	0.5%
Noblesville township	Noblesville city	110502	3	U	NO	5	32.1%	564	1,756	16.8%	3.6%	0.5%
Noblesville township	Noblesville city	110502	4	U	NO	5	30.7%	748	2,439	16.8%	3.6%	0.5%
Clay township	Carmel city	111006	1	U	NO	5	30.4%	14	46	15.5%	2.6%	3.0%
Clay township		111006	1	U	NO	5	24.4%	332	1,359	15.5%	2.8%	3.0%

Noblesville township	Noblesville city	110502	2	U	NO	5	22.4%	613	2,737	16.8%	3.6%	0.5%
Adams township	Sheridan town	110300	2	R	YES	4	100.0%	34	34	17.4%	3.3%	1.9%
Noblesville township		110502	4	R	YES	4	100.0%	17	17	16.8%	3.2%	0.5%
Washington township		110300	5	U	YES	4	98.8%	166	168	17.4%	3.3%	1.9%
Clay township	Carmel city	111005	4	U	YES	4	74.8%	202	270	14.6%	2.4%	2.6%
Adams township		110300	4	U	YES	4	74.6%	88	118	17.4%	3.3%	1.9%
Adams township	Sheridan town	110300	4	U	YES	4	72.5%	840	1,158	17.4%	3.3%	1.9%
Adams township	Sheridan town	110300	3	U	YES	4	66.4%	526	792	17.4%	3.3%	1.9%
Noblesville township		110502	5	U	YES	4	61.9%	133	215	16.8%	3.2%	0.5%
Washington township		110300	5	R	YES	4	61.5%	646	1,051	17.4%	3.3%	1.9%
Clay township	Carmel city	111005	4	U	YES	4	58.7%	540	920	14.6%	2.4%	2.6%
Clay township	Carmel city	111005	3	U	YES	4	56.6%	917	1,620	14.6%	2.4%	2.6%
Adams township	Sheridan town	110300	2	U	YES	4	55.8%	207	371	17.4%	3.3%	1.9%
Clay township	Carmel city	111005	2	U	YES	4	54.7%	1,465	2,678	14.6%	2.4%	2.6%
Adams township		110300	2	R	YES	4	51.5%	723	1,404	17.4%	3.3%	1.9%
Delaware township		110803	2	U	NO	4	47.3%	62	131	12.2%	2.0%	2.2%
Delaware township		110803	3	U	NO	4	47.3%	26	55	12.2%	2.0%	2.2%
Clay township	Carmel city	111005	1	U	NO	4	47.0%	671	1,428	14.6%	2.4%	2.6%
Noblesville township		110502	2	U	NO	4	46.3%	19	41	16.8%	3.2%	0.5%
Adams township		110300	1	R	NO	4	43.1%	449	1,042	17.4%	3.3%	1.9%
Noblesville township		110502	4	U	NO	4	38.6%	96	249	16.8%	3.2%	0.5%
Delaware township		110803	1	U	NO	4	33.0%	149	452	12.2%	2.0%	2.2%
Noblesville township		110502	3	U	NO	4	30.0%	61	203	16.8%	3.2%	0.5%
Washington township		110300	6	R	NO	4	22.4%	197	881	17.4%	3.3%	1.9%
Washington township		110300	6	U	NO	4	18.8%	80	425	17.4%	3.3%	1.9%
Adams township		110300	2	U	NO	4	0.0%	0	103	17.4%	3.3%	1.9%
Delaware township		110803	4	U	NO	4	0.0%	0	62	12.2%	2.0%	2.2%

Jackson township		110201	2	U	YES	3	100.0%	50	50	31.2%	6.7%	0.0%
Washington township	Westfield town	110400	3	U	YES	3	91.3%	1,457	1,596	15.8%	2.9%	0.2%
Noblesville township	Noblesville city	110503	2	U	YES	3	77.4%	514	664	15.4%	3.2%	0.0%
Jackson township	Arcadia town	110201	3	U	YES	3	74.1%	923	1,245	31.2%	6.7%	0.0%
Washington township	Westfield town	110400	2	U	YES	3	68.5%	538	785	15.8%	2.9%	0.2%
Jackson township	Atlanta town	110201	1	R	YES	3	68.3%	483	707	31.2%	6.7%	0.0%
Washington township		110503	1	U	YES	3	60.8%	118	194	15.4%	2.8%	0.0%
Noblesville township		110503	2	U	YES	3	58.0%	40	69	15.4%	2.8%	0.0%
Delaware township		110802	3	U	YES	3	55.8%	24	43	13.7%	2.4%	1.0%
Clay township		111102	2	U	YES	3	54.2%	900	1,662	11.9%	1.9%	1.6%
Washington township		110503	1	R	YES	3	53.5%	205	383	15.4%	2.8%	0.0%
Washington township	Westfield town	110400	1	U	YES	3	52.6%	1,142	2,173	15.8%	2.9%	0.2%
Washington township	Westfield town	110400	4	R	YES	3	52.0%	77	148	15.8%	2.9%	0.2%
Jackson township		110201	2	R	NO	3	50.2%	345	687	31.2%	6.7%	0.0%
Clay township		111102	3	U	NO	3	49.5%	437	883	11.9%	1.9%	1.6%
Jackson township		110201	4	R	NO	3	46.9%	525	1,120	31.2%	6.7%	0.0%
Jackson township	Arcadia town	110201	2	U	NO	3	45.8%	232	507	31.2%	6.7%	0.0%
Delaware township	Fishers town	110802	3	U	NO	3	45.2%	1,692	3,742	13.7%	2.1%	1.0%
Clay township		111102	1	U	NO	3	44.9%	567	1,263	11.9%	1.9%	1.6%
Washington township		110503	2	R	NO	3	44.0%	70	159	15.4%	2.8%	0.0%
Noblesville township		110503	2	R	NO	3	43.0%	466	1,084	15.4%	2.8%	0.0%
Washington township	Westfield town	110400	4	U	NO	3	41.9%	1,152	2,752	15.8%	2.9%	0.2%
Washington township	Westfield town	110503	1	U	NO	3	41.7%	350	839	15.4%	2.8%	0.0%
Delaware township		110802	4	U	NO	3	38.1%	467	1,226	13.7%	2.4%	1.0%
Delaware township	Fishers town	110802	1	U	NO	3	37.6%	1,217	3,233	13.7%	2.1%	1.0%
Delaware township		110802	1	U	NO	3	37.1%	56	151	13.7%	2.4%	1.0%
Noblesville township		110503	1	R	NO	3	36.0%	217	603	15.4%	2.8%	0.0%

Noblesville township	Noblesville city	110503	1	U	NO	3	34.7%	1,035	2,983	15.4%	3.2%	0.0%
Jackson township		110201	1	R	NO	3	33.7%	58	172	31.2%	6.7%	0.0%
Clay township	Carmel city	111004	1	U	NO	3	32.4%	423	1,305	12.3%	1.8%	1.1%
Noblesville township		110503	1	U	NO	3	32.4%	68	210	15.4%	2.8%	0.0%
Washington township		110400	3	R	NO	3	31.2%	159	510	15.8%	2.9%	0.2%
Delaware township	Fishers town	110802	2	U	NO	3	29.9%	606	2,027	13.7%	2.1%	1.0%
Washington township		110400	4	U	NO	3	24.2%	912	3,763	15.8%	2.9%	0.2%
Delaware township	Fishers town	110802	4	U	NO	3	23.5%	713	3,033	13.7%	2.1%	1.0%
Washington township		110400	3	U	NO	3	21.6%	215	996	15.8%	2.9%	0.2%
Clay township	Carmel city	111004	2	U	NO	3	21.0%	373	1,773	12.3%	1.8%	1.1%
Washington township	Westfield town	110503	2	U	NO	3	20.6%	143	694	15.4%	2.8%	0.0%
Washington township		110400	4	R	NO	3	19.5%	54	277	15.8%	2.9%	0.2%
Clay township		111102	4	U	NO	3	15.7%	557	3,540	11.9%	1.9%	1.6%
Washington township		110400	1	U	NO	3	0.0%	0	32	15.8%	2.9%	0.2%
Washington township	Westfield town	110503	1	R	NO	3	0.0%	0	17	15.4%	2.8%	0.0%
Noblesville township	Noblesville city	110503	2	R	NO	3	0.0%	0	247	15.4%	3.2%	0.0%
Delaware township		110802	2	U	NO	3	0.0%	0	18	13.7%	2.4%	1.0%
Wayne township	Noblesville city	110100	3	R	YES	2	100.0%	68	68	19.7%	4.3%	0.0%
Clay township	Carmel city	111102	3	U	YES	2	100.0%	19	19	11.9%	1.7%	1.6%
Clay township	Carmel city	110902	2	U	YES	2	78.2%	1,072	1,370	8.3%	0.8%	1.0%
White River township		110100	1	R	YES	2	70.3%	624	887	19.7%	3.9%	0.0%
Wayne township		110100	3	R	YES	2	68.7%	791	1,151	19.7%	3.9%	0.0%
Jackson township		110202	1	R	YES	2	68.2%	719	1,055	19.1%	3.7%	0.0%
Jackson township	Cicero town	110202	3	U	YES	2	67.3%	643	955	19.1%	3.7%	0.0%
White River township		110100	2	R	YES	2	63.5%	1,037	1,632	19.7%	3.9%	0.0%
Wayne township		110100	4	R	YES	2	62.8%	674	1,074	19.7%	3.9%	0.0%
Clay township	Carmel city	110902	1	U	YES	2	55.5%	711	1,282	8.3%	0.8%	1.0%

Jackson township	Cicero town	110202	2	U	YES	2	53.2%	436	819	19.1%	3.7%	0.0%
Jackson township	Cicero town	110202	1	U	NO	2	50.7%	1,123	2,216	19.1%	3.7%	0.0%
Clay township	Carmel city	110902	2	U	NO	2	47.0%	170	362	8.3%	0.8%	1.0%
Delaware township	Fishers town	110803	4	U	NO	2	39.6%	1,333	3,369	12.2%	1.7%	2.2%
Delaware township	Fishers town	110803	1	U	NO	2	36.2%	1,885	5,209	12.2%	1.7%	2.2%
Clay township	Carmel city	110902	4	U	NO	2	34.6%	387	1,118	8.3%	0.8%	1.0%
Delaware township	Fishers town	110803	2	U	NO	2	34.1%	736	2,157	12.2%	1.7%	2.2%
Delaware township	Fishers town	110803	3	U	NO	2	34.1%	485	1,424	12.2%	1.7%	2.2%
Clay township	Carmel city	111003	3	U	NO	2	33.3%	428	1,284	9.6%	1.2%	1.9%
White River township		110100	2	U	NO	2	32.4%	24	74	19.7%	3.9%	0.0%
Clay township	Carmel city	111003	1	U	NO	2	31.5%	477	1,512	9.6%	1.2%	1.9%
Delaware township	Fishers town	110803	5	U	NO	2	29.1%	561	1,927	12.2%	1.7%	2.2%
Clay township		110902	3	R	NO	2	26.8%	84	313	8.3%	1.0%	1.0%
Clay township	Carmel city	111102	1	U	NO	2	25.8%	71	275	11.9%	1.7%	1.6%
Clay township	Carmel city	110902	3	U	NO	2	25.6%	253	990	8.3%	0.8%	1.0%
Wayne township		110100	3	U	NO	2	25.3%	24	95	19.7%	3.9%	0.0%
Clay township		110902	4	U	NO	2	25.0%	350	1,401	8.3%	1.0%	1.0%
Jackson township		110202	1	U	NO	2	22.8%	49	215	19.1%	3.7%	0.0%
Clay township		110902	3	U	NO	2	16.5%	915	5,550	8.3%	1.0%	1.0%
Clay township	Carmel city	111003	2	U	NO	2	14.8%	289	1,954	9.6%	1.2%	1.9%
Fall Creek township	Noblesville city	110801	2	R	YES	1	100.0%	35	35	13.7%	2.8%	0.0%
Fall Creek township		110801	2	R	YES	1	55.0%	192	349	13.7%	2.4%	0.0%
Fall Creek township	Fishers town	110801	2	R	YES	1	52.0%	39	75	13.7%	2.1%	0.0%
Clay township		110901	1	U	NO	1	44.2%	289	654	7.0%	0.7%	0.1%
Fall Creek township		110801	1	R	NO	1	41.5%	449	1,081	13.7%	2.4%	0.0%
Clay township	Carmel city	111001	3	U	NO	1	37.6%	114	303	5.9%	0.2%	0.1%
Fall Creek township	Fishers town	110801	1	R	NO	1	33.1%	180	543	13.7%	2.1%	0.0%

Clay township		110901	1	R	NO	1	32.1%	25	78	7.0%	0.7%	0.1%
Clay township		110901	2	U	NO	1	31.6%	12	38	7.0%	0.7%	0.1%
Fall Creek township		110801	1	U	NO	1	30.2%	338	1,118	13.7%	2.4%	0.0%
Fall Creek township	Fishers town	110801	2	U	NO	1	27.4%	3,165	11,554	13.7%	2.1%	0.0%
Clay township	Carmel city	111101	1	U	NO	1	27.3%	112	410	8.4%	0.9%	0.8%
Fall Creek township	Fishers town	110801	1	U	NO	1	26.6%	169	635	13.7%	2.1%	0.0%
Clay township	Carmel city	111001	3	R	NO	1	26.3%	10	38	5.9%	0.2%	0.1%
Fall Creek township		110801	2	U	NO	1	25.1%	424	1,689	13.7%	2.4%	0.0%
Clay township	Carmel city	110901	3	U	NO	1	20.2%	521	2,575	7.0%	0.5%	0.1%
Clay township		111001	1	R	NO	1	19.9%	126	634	5.9%	0.4%	0.1%
Clay township		111001	2	U	NO	1	15.7%	251	1,595	5.9%	0.4%	0.1%
Clay township	Carmel city	110901	1	U	NO	1	15.2%	1,241	8,170	7.0%	0.5%	0.1%
Clay township	Carmel city	110901	2	U	NO	1	14.4%	544	3,777	7.0%	0.5%	0.1%
Clay township		111001	1	U	NO	1	13.6%	244	1,788	5.9%	0.4%	0.1%
Clay township	Carmel city	111101	1	U	NO	1	10.8%	367	3,403	8.4%	0.9%	0.8%
Clay township	Carmel city	111001	3	U	NO	1	4.8%	112	2,343	5.9%	0.2%	0.1%

ATTACHMENT B

HAMILTON COUNTY, INDIANA		
NSP Priority by Census Tract		
Block Group	Priority	Township community(ies) covered
180571111024	M	Clay Twp
180571111023	M	Carmel, Clay Twp
180571111022	H	Carmel, Clay Twp
180571111021	M	Carmel, Clay Twp
180571111011	L	Carmel, Clay Twp
180571110062	H	Carmel, Clay Twp
180571110061	H	Carmel, Clay Twp
180571110054	M	Carmel
180571110053	M	Carmel
180571110052	M	Carmel
180571110051	M	Carmel
180571110042	L	Carmel
180571110041	L	Carmel
180571110033	L	Carmel
180571110032	L	Carmel
180571110031	M	Carmel
180571110013	M	Carmel
180571110012	L	Carmel
180571110011	M	Carmel, Clay Twp
180571109024	L	Carmel
180571109023	M	Carmel
180571109022	M	Carmel
180571109021	L	Carmel
180571109013	L	Carmel
180571109012	L	Carmel
180571109011	L	Carmel
180571108035	L	Fishers, Delaware Twp
180571108034	M	Fishers, Delaware Twp
180571108033	M	Fishers, Delaware Twp
180571108032	M	Fishers, Delaware Twp
180571108031	M	Fishers, Delaware Twp
180571108024	M	Fishers, Delaware Twp
180571108023	M	Fishers, Delaware Twp
180571108022	M	Fishers, Delaware Twp
180571108021	H	Fishers, Delaware Twp
180571108012	H	Fishers, Fall Creek Twp
180571108011	H	Fishers, Fall Creek Twp
180571107003	H	Noblesville
180571107002	H	Noblesville
180571107001	H	Noblesville
180571106002	M	Noblesville
180571106001	H	Noblesville
180571105042	H	Noblesville, Noblesville Twp
180571105041	H	Noblesville, Noblesville Twp
180571105032	H	Noblesville, Noblesville Twp
180571105031	H	Noblesville, Noblesville Twp
180571105025	M	Noblesville, Noblesville Twp
180571105024	H	Noblesville, Noblesville Twp
180571105023	H	Noblesville, Noblesville Twp
180571105022	H	Noblesville, Noblesville Twp
180571105021	M	Noblesville, Noblesville Twp
180571104004	H	Westfield, Washington Twp, Noblesville Twp
180571104003	H	Westfield, Washington Twp
180571104002	H	Westfield, Washington Twp, Noblesville Twp
180571104001	M	Westfield, Washington Twp, Noblesville Twp
180571103006	H	Westfield, Washington Twp

180571103005	M	Westfield, Washington Twp
180571103004	H	Sheridan, Adams Twp
180571103003	H	Sheridan, Adams Twp
180571103002	H	Sheridan, Adams Twp
180571103001	M	Adams Twp
180571102023	H	Cicero, Jackson Twp
180571102022	M	Cicero, Jackson Twp
180571102021	M	Cicero, Jackson Twp
180571102014	H	Jackson Twp
180571102013	H	Arcadia, Jackson Twp
180571102012	H	Jackson twp
180571102011	H	Atlanta, Jackson Twp
180571101004	L	Noblesville, Wayne Twp
180571101003	H	Noblesville, Wayne Twp
180571101002	M	Adams Twp
180571101001	M	Adams Twp