

CLARK COUNTY AND NORTH LAS VEGAS SUBSTANTIAL AMENDMENT TO THE FY 2010 ACTION PLAN for HOUSING AND COMMUNITY DEVELOPMENT

NEIGHBORHOOD STABILIZATION PROGRAM 3 (NSP3)

Clark County proposes to amend the 2010 Action Plan and Consolidated Plan to fulfill the application requirements to receive Neighborhood Stabilization Program 3 (NSP3) funds through the U.S. Department of Housing and Urban Development (HUD), authorized under Section 1497 of the Wall Street Reform and Consumer Protection Act of 2010 (Pub. L. 111-203, approved July 21, 2010) (Dodd-Frank Act). The grants are to be considered Community Development Block Grant (CDBG) funds. As the lead agency for the Urban County CDBG Consortium 2009-2011, Clark County will submit this Substantial Amendment on behalf of Clark County and the City of North Las Vegas. Each jurisdiction has described its NSP3 activities in separate sections of this Amendment. In general, these NSP3 funds may be used for the acquisition and/or redevelopment of foreclosed and abandoned properties.

NSP3 Grantee Information

NSP3 Program Administrator Contact Information	
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1. Areas of Greatest Need

Map Submission

A map of the Areas of Greatest need is included as an attachment (Exhibit A). The data generated at the HUD NSP3 Mapping Tool for Preparing Action Plan website for the three proposed NSP3 target areas is also included as an attachment (Exhibit B).

Data Sources Used to Determine Areas of Greatest Need

Describe the data sources used to determine the areas of greatest need.
<p><u>Response:</u> Clark County and North Las Vegas utilized a variety of data sources in order to determine the proposed areas of greatest need for NSP3 funds in order to establish goals, determine a level of assistance, and design an appropriate program for each area based upon its needs. Areas of greatest need were identified and sized in order to attempt to achieve a visible impact as a result of NSP3 activities and investment in those areas. Market conditions were assessed for Clark County and the Southern Nevada region as a whole as well as the individual proposed target areas. Existing assets and recent public/private investments were evaluated to determine leveraging factors that would enhance our efforts and achieve greater impact.</p> <p>It is our intention to build upon lessons learned as well as the groundwork established and progress made through NSP1 implementation in order to maximize the impact of NSP3 activities. In addition to</p>

data and market analysis, staff performed a review and analysis of the activities currently being implemented through the first round of NSP funding. This review included a written survey distributed to NSP1 grantees (nonprofit Developers and nonprofit housing counseling agencies) as well as a roundtable discussion to discuss what strategies have worked the best so far, information regarding consumer demand as gathered from their clients, and what strategies could be modified in order to increase the efficiency and effectiveness of NSP activities. Clark County also referred to the FY 2010 Action Plan for Housing and Community Development to review other community projects recently completed or in progress. The redevelopment of Buena Vista Springs in North Las Vegas has been a priority project since 2004 and now meets the requirements of NSP3.

Staff collected housing and economic data from the following sources:

- HUD Foreclosure Need and Mapping Tool website (www.huduser.org/portal/datasets/NSP.html)
- HUD User Data sets (www.huduser.org) for NSP Data and USPS Vacancy rates
- The Center for Business and Economic Research (University of Nevada – Las Vegas)
- Greater Las Vegas Association of Realtors (GLVAR)
- Clark County Assessor current foreclosure data
- National Community Stabilization Trust – current REO inventory and public Notices of Default
- Clark County Monitoring Program (www.monitoringprogram.com)
- Clark County Comprehensive Planning Department
- Clark County School District
- Brookings Mountain Monitor
- HUD Housing Market Analysis for the Las Vegas-Paradise Metropolitan area
- Foreclosure-Response.org
- PolicyMap
- Wadhwa, A. - Data collected for “Baselining CO₂ Emissions of Las Vegas Metropolitan Area Residential Building Sector.” Master’s Thesis. University of Nevada, Las Vegas. School of Architecture. 2007
- North Las Vegas Police Department crime data
- North Las Vegas Code Enforcement

Determination of Areas of Greatest Need

Describe how the areas of greatest need were established.

Response:

HOUSING MARKET CONDITIONS

Southern Nevada’s foreclosure crisis is extensive and widespread throughout all corners of the Valley. Based upon HUD’s definition and estimates of “need”, all but one census tract in Clark County qualified for NSP3 funding with a minimum HUD foreclosure related needs score of 17 out of 20 (17 is the minimum threshold score for the State of Nevada).

The Southern Nevada region housing market is arguably the hardest hit metropolitan area in the country and in many ways, the epicenter of the financial and housing crisis. This can be attributed to not only the initial wave of economic distress as experienced in many areas, but also the continued inability to slow and reverse the continued decline across multiple indicators. The cyclical and volatile nature of the region’s two primary industries, gaming and tourism, continue to impact the area’s slow recovery as they are dependent upon a national economic recovery and increased consumer confidence. However,

recent indicators show that a small economic recovery may have begun in recent months. The Clark County tourism index is now 5.95% higher than a year ago as a result of recent growth in gaming revenue, hotel room occupancy and passenger counts at the airport – although a long way off from pre-recession levels, this is the highest growth level since 2007 signaling a possible upward trend for this important economic sector. The construction industry also posted a small increase in the number of construction jobs and residential permits in October 2010 which is an encouraging sign, but industry experts cannot yet say if this industry has reached bottom.

Since 2007, approximately 70,000 housing units have been foreclosed upon and we continue to experience approximately 6,000 new foreclosures every quarter. Based upon the estimated number of housing units in Clark County for 2010 (814,868), this represents a new foreclosure rate of approximately 3% per year. The actual number of foreclosures is difficult to assess due to the “phantom” inventory of foreclosures held by banks but not yet made available for sale. We do not know the timing of when financial institutions may release a significant number of REO properties in a particular neighborhood. It is also estimated that 25% of all mortgage holders are experiencing serious delinquency (90 days or more past due) which is the second highest level in the nation and indicates that foreclosure rates will continue to increase throughout 2011.

Housing prices in this region have fallen more than 50% since their peak through 2010, the largest decline of any other metropolitan area. Despite some increases in housing prices in other U.S. markets, prices continue to decline in Southern Nevada. However, declines in house prices have been slowing steadily throughout 2010.

The high percentage of local homes purchased with cash in 2010 was the highest ever recorded (48%) and likely unmatched anywhere in the nation – it is also expected to increase through 2011. The housing market continues to experience relatively high absorption rates, although micro-markets exist throughout Clark County and older more deteriorated neighborhoods absorb inventory at a much slower pace. At the end of 2009, 71% of all single family homes in the metropolitan area sold within 60 days and by the end of 2010, 60% of all homes sold within 60 days. These statistics indicate significant investor activity and competition for homeowners at affordable price points. It is estimated that approximately 40% of all home sales are to investors rather than owner-occupied buyers. In addition, 2010 experienced a trend in the continued increase in short sales with 25% of all home sales occurring when the bank agrees to sell the home for less than what the borrower owes on the mortgage.

The median price of single-family homes sold in Southern Nevada was \$132,000 as of December 2010 which represents a decrease of 3% from 2009. However, this is a modest decrease compared to the 22% decline in 2009 and the 33% decline in 2008. Experts believe that housing prices are now hovering near the bottom in our region. Therefore this is a critical time for Clark County to take advantage of a relatively low priced housing market, and impact as many units as possible given the available resources.

Between September 2008 and September 2009, unemployment in Southern Nevada nearly doubled jumping 6 percentage points to 13.5%. Since then, the unemployment rate has continued to rise to an estimated current level of 15%. This increase in unemployment is the largest increase of any major metropolitan area throughout the United States. One out of seven jobs that existed in Southern Nevada at the economic peak of 2007 no longer exist today and little change is expected in future job growth throughout the first half of 2011. High rates of unemployment put current mortgage holders at a risk for future foreclosure and high rates of Notice of Defaults throughout the region is evidence of the challenges those citizens currently face.

Despite dramatic decreases in property values, housing affordability remains a concern throughout Clark County. This is due to not only high unemployment, but also tightening credit markets making it increasingly difficult for families to secure 1st mortgage loans in order to take advantage of lower home prices. There is also a need for homebuyers to have significant liquid savings with average closing costs ranging from 5-10% of home sales prices. This indicates a need for rental housing for those families unable to secure mortgage financing at this time, as well as downpayment assistance to maintain the affordability for those that do obtain mortgage loan approval.

Clark County staff utilized the data sources described above as well as the experiences and lessons learned from NSP1 in order to determine areas where NSP3 funds can meet HUD’s required impact given the eligible NSP3 activities and the limited amount of resources available. Although we recognize that NSP3 is not the answer to full housing market recovery in Southern Nevada, we believe that the activities proposed will create a meaningful impact in the target areas identified, will create opportunities for employment in the construction industry, and will improve the lives of households assisted over the course of program implementation.

AREAS OF GREATEST NEED

The combined index score and need factor of all three proposed target areas (as described below) generated by the HUD mapping tool is 19.59. The State of Nevada minimum threshold is 17 and the maximum score possible is 20.

The following narratives describe each of the three proposed target areas in detail. Clark County and North Las Vegas propose eligible NSP3 activities in each of these target areas in order to meet the requirements of Section 2301(c)(2) of HERA, as amended by the Recovery Act and the Dodd-Frank Act. These activities are described in Section 6 of this Amendment (NSP Information by Activity). NSP3 funds will be distributed by these areas of greatest need based upon the cost of each activity to make the necessary impact to the target area.

Distribution and Use of NSP3 Funds (Clark County and North Las Vegas)

TARGET AREA	ACTIVITY	BUDGET	NATIONAL OBJECTIVE
Winchester	Acquisition Rehab for Rental (SFH)	\$5,250,000	Low-income housing to meet 25% set aside (LH25)
Winchester	Acquisition Rehab for Resale (SFH)	\$4,000,000	Low Moderate Middle Income Housing (LMMH)
Southwest Clark County	Homebuyer Assistance Program	\$2,625,000	Low Moderate Middle Income Housing (LMMH)
Buena Vista Springs	Land Bank	\$6,352,935	Low-Moderate-Middle Income Area Benefit (LMMA)
N/A	Administration	\$2,025,326	N/A
TOTAL		\$20,253,261	

**TARGET AREA for ACQUISITION/REHABILITATION FOR RENTAL AND HOMEOWNERSHIP:
WINCHESTER – Clark County, Neighborhood ID #2785827**

The Winchester target area has the highest possible HUD need factor score of 20 indicating that this is an area of greatest need for Clark County. With over 300 foreclosure starts in the past year and with the majority of housing constructed more than 25 years ago (84% of the homes were constructed between 1980 and 1984), older housing stock will greatly benefit from a rehabilitation program and older neighborhoods typically experience slower absorption rates than newer communities. In addition, it is estimated that 25% of housing units are 90 days or more delinquent and over 35% of the housing units had a high cost mortgage between 2004 and 2007. Therefore the rate of foreclosures is a continued risk and concern. There were 166 REO units over the past year and an estimated 60 properties must be assisted with NSP3 funds in order to achieve a meaningful impact. This target area is a sub-area of the NSP1 Plan for Clark County.

Despite heavy foreclosure inventory and risk, this area has a relatively low vacancy rate of 4.6% (Las Vegas Metropolitan area average vacancy was 6.44% as of September 2010) indicating that efforts to acquire foreclosed properties will provide a relatively greater visible impact on neighborhood stabilization due to the lower likelihood of vacancy contributing to further neighborhood decline. The Winchester area is currently a mixed-use community comprised of retail centers, community facilities, outdoor recreation, and a variety of housing stock types including single family, multi-family and manufactured housing. Proposed activities to encourage additional affordable options for both rental and homeownership ensure that any one type of housing will not be concentrated, but rather will continue the mixed housing composition of this community.

An acquisition/rehabilitation program will meet the goals of NSP3 within this deeply targeted area to acquire foreclosed and vacant property, rehab not only to code but also NSP rehab standards for energy efficiency, and then sell or rent those homes as affordable housing. Older and blighted housing stock is less likely to improve with market adjustments as the economy improves in the long-run without significant investment in rehabilitation in order to arrest the decline of values and provide safe, decent and affordable housing for its residents. Testing for environmental hazards (mold, lead, asbestos) as required by local and Federal regulations will be completed on any property assisted with NSP3 funds and proper abatement/remediation/clearance will be obtained prior to occupancy. According to energy consumption data available, the Winchester target area consumes energy at average rates 16% higher than the metropolitan region. This translates to an estimated \$240 more per year in energy costs per household than the regional average based on today's rates. Due to the age of housing stock as well as these energy consumption estimates, the Winchester target area shows immense potential for energy efficiency retrofits.

There has been a major demographic shift in the Winchester area in terms of income, race and ethnicity since the year 2000. Poverty in 2000 for Winchester was already higher than many places in the Las Vegas valley at 14%. However, according to the 2006-2008 American Community Survey (ACS), the poverty percentage for Winchester is now estimated to be almost 19%, a significant increase in the last 10 years and the highest rate among all of the Census Designated Places and incorporated cities. Race and ethnicity has also dramatically changed in Winchester since the Census 2000. Over 70% of the area's current residents are within the NSP income limits (less than 120% AMI). In 2000, the population was 72% White, with 6% Black and 22% all other races. The Hispanic population was gauged at 28.6%. Winchester is heading towards becoming a plurality as the White population has decreased to 59%

while the Black population has increased to 8% and all other races have increased to 34%. The most significant change is the large influx of Hispanic people to the area, now representing 41% of the population.

The Winchester target area is a priority area for other Federally funded projects which will provide leverage to the NSP3 activities in this neighborhood as well as enhanced amenities for the residents:

- The current CDBG Capital Improvement Plan includes \$586,868 for the addition of a dance studio and other improvements to the Winchester Cultural Center, the main community center serving the target area.
- \$43,245 in CDBG funds was used in 2009 to construct a shade structure for the skate park.
- Sierra Pines Senior Apartments, a 90 unit affordable housing project was constructed in 1995 with \$35,000 in Clark County HOME funds.
- The Regional Flood Control District has invested \$7 million in the Flamingo Wash from Desert Inn to Eastern Avenue for channel improvements.
- A total of \$4,118,400 in funds from the Southern Nevada Public Lands Management Act (SNPLMA) is being used to construct the Flamingo/Arroyo Trail between Boulder Highway and Pecos McLeod, passing directly through the middle of the target area providing a link to the Clark County Wetlands Park and other federal lands on the east side of the valley.
- Metro Arts "ZAP" Project received \$36,808 in County Outside Agency Grant funds to work with artists to paint artwork on utility boxes in the Winchester Community.

In total, these projects represent over \$11.8 million in leveraged public funds recently invested or planned for the Winchester target area or in close proximity to the target area.

City Bus routes are available along all borders of the target area on Sahara, Eastern, Desert Inn and US 95 as well as on Pecos/McLeod passing directly in front of the Winchester Cultural Center and along the retail/employment corridor of Boulder Highway providing excellent access to public transportation for residents of this area. The area is bordered by major arterial corridors as well as the US 95 highway linking this community to all other parts of the Valley.

Outreach to current residents and business owners of the target area will be essential to a successful NSP program in this area in order to provide quick occupancy following the completion of homes rehabbed in the area. The Winchester Town Board as well as the Winchester Cultural Center and local area schools will be included in those outreach efforts serving as possible networks for communication as well as central meeting facilities for community meetings.

**TARGET AREA for HOMEBUYERS ASSISTANCE PROGRAM:
SOUTHWEST CLARK COUNTY – Neighborhood ID # 6897460**

The Southwest Clark County target area has the second highest possible HUD need factor score of 19 indicating that this is an area of greatest need for Clark County. This is a community with pockets of

very densely populated areas and subdivisions combined with a substantial mix of established retail centers, community facilities (including schools, hospitals, churches, and libraries) and outdoor recreation opportunities. The inclusion of this new target area under NSP3 (the area was not part of the NSP1 plan) promotes housing choice to Clark County residents as required by the Analysis of Impediments to Fair Housing. The majority of the housing units contained within this target area were constructed less than 10 years ago. It is expected that a large supply of suitable homes likely to need no rehabilitation will be available for purchase over the next couple of years. Currently over 16% of the existing housing units are 90 days or more delinquent or in foreclosure and close to 18% of households had a high cost mortgage between 2004 and 2007 indicating that the rate of foreclosures is a continued risk and concern. However, it can be expected to stabilize without the need for property rehab. Therefore, Clark County can achieve a meaningful impact on the neighborhood by providing assistance for homebuyer occupancy of approximately 20% of the total REO inventory over the past year (174 housing units per the HUD mapping tool).

Despite the current foreclosure inventory and risk, this area has a relatively low vacancy rate of 4.8% (Las Vegas Metropolitan area average vacancy was 6.44% as of September 2010) indicating that efforts to acquire foreclosed properties will provide a relatively greater visible impact on neighborhood stabilization due to the lower likelihood of vacancy contributing to further neighborhood decline. Approximately 40% of the existing residents earn incomes at or below 120% AMI indicating a strong base of potential homebuyers to build upon with a consumer-driven downpayment assistance program in a high-demand area.

City bus service is available along the major corridors of Rainbow and Jones providing public transportation for the eastern side of the target area. Blue Diamond on the South side as well as direct connections to both Interstate 215 (Las Vegas Beltway) and Interstate 15 provide residents with excellent access to other parts of the Valley.

This target area contains other projects representing recent public and private investment such as:

- \$1.5 million in County HOME funds plus additional private activity bonds and 4% tax credits were used to construct Arbor Pointe Apartments, a SNPLMA affordable housing project of 180 units of family housing is just to the North the target area completed in 2010. (fully occupied to date)
- The Windmill Library and Service Center is a new construction 142,000 square foot \$34 million project located within the target area and opening in the Summer of 2011. The project will provide a state-of-the art library incorporating high energy efficiency and sustainable design features (seeking LEED Gold) as well as a service center for library district administrative offices, processing and distribution facilities. The campus will also include a 300 seat auditorium to be used for community events.
- The Durango-Blue Diamond Public Facilities Plan will provide new school facilities, Blue Diamond wash improvements, multi-use and equestrian trails (trail construction to be completed in mid-late 2011), as well as a 10-20 acre neighborhood park with sports fields. Public meetings were conducted in 2008 and 2009 to provide input and feedback to planners. The trails in this area are funded with \$4.5 million in SNPLMA funds and constructed by the Clark County Public Works department.
- Planned communities throughout the target area have provided green space and parks for their

residents financed through private funds at the time of initial construction.

- Clark County Community Resources Management has five SNPLMA parcels (vacant land) in and surrounding the target area reserved for the development of affordable rental housing as future funding sources are made available and proposals received from developers.

In total, these projects represent over \$40 million in leveraged public and private funds recently invested or planned in and around the Southwest Clark County target area.

Outreach to current residents and business owners of the target area will be essential to a successful NSP program in this area in order to provide quick occupancy. The Spring Valley Town Board as well as the new Windmill Library and local area schools will be included in those outreach efforts serving as possible networks for communication as well as central event facilities for community meetings.

TARGET AREA FOR LAND BANK:

BUENA VISTA SPRINGS – Neighborhood ID # 6240753

The Buena Vista Springs target area has the highest possible HUD factor score of 20 indicating that it is an area of greatest need for the City of North Las Vegas and Clark County. The adjacent area has 157 foreclosures with 41.1% of homes at a high mortgage cost and 27.2% of the homes are 90 days or more delinquent or in foreclosure. There are 86 real estate owned (REO) housing units.

Buena Vista Springs Apartments are located in a neighborhood locally known as North Valley. The primary race and ethnicity for the North Valley neighborhood is Black or African American. The average household income for this area is \$44,000.

Buena Vista Springs is a dilapidated complex built in 1965 (please see photos attached as Exhibit C), and both northern and southern campuses meet the Nevada Revised Statute Title 18, Chapter 231 of blight under the following factors:

- ✓ Faulty arrangement of the interior and spacing of buildings.
- ✓ Inadequate provision for ventilation, light, sanitation, open spaces and recreational facilities.
- ✓ Age, obsolescence, deterioration, dilapidation, mixed character or shifting of uses.

After acquisition, this property will be land banked until an appropriate affordable housing redevelopment project can be developed and the market recovers. Both campuses have been rife with crime and vandalism for many years. This project was totally vacated at the end of 2007. With rentals restarting in 2008, calls for police assistance resumed. According to the North Las Vegas Police Department, 348 calls were received for this project during 2010. (See Dispatched Police Service Calls Chart – Exhibit D) Both campuses are also plagued by continued code enforcement and building safety violations. Over \$90,000 in code violation fines have been assessed to the project with over \$78,000 still outstanding. Due to the age and upkeep of the structures, issues of mold, lead and asbestos contamination are suspected, but have not yet been confirmed through testing.

The existence of this blighted, foreclosed property serves to diminish the property value of the surrounding neighborhood which is comprised primarily of single-family homes. Many vacant and foreclosed homes in the area are also experiencing rapidly lowering home values as the perception of the neighborhood finds it to be an undesirable place to rent, lack of services and amenities, and

excessive crime.

North Valley is an established community and home to many working families and long-time North Las Vegas residents. Ninety-eight percent of the neighborhood is residentially zoned, primarily for single-family homes. More than 65% of the households earn \$50,000 per year or less, qualifying as low-to-moderate income. The housing stock in the area varies in age with 33.8% built prior to 1969; 21% built between 1970 and 1990 and the remainder being built within the past two decades.

There are very few legitimate businesses located in or adjacent to the target area. There are only 44 registered businesses nearby with a resident work base of 310 employees. Most businesses are within strip malls and include liquor stores, “mom n’ pop”-type fast food establishments and a national chain drug store. Recreational outlets for children and young adults are limited. The closest health facility to the target area is North Vista Hospital/Medical Center which is almost three miles away. Another unmet need for the neighborhood is a regional high school. All the children in the area are bussed away from the community, thereby losing a community focal point.

This target area contains other projects representing significant recent public and private investment such as:

- Martin Luther King Boulevard has been widened to serve as a major north/south arterial and serves this neighborhood. Now a six-lane thoroughfare, this road handles over 40,000 vehicles per day. Accessibility to other parts of the city has been greatly improved. \$43.8 million in public funds were used to complete this project. This neighborhood is also served by being located on a major bus route serviced by the Regional Transportation Commission of Southern Nevada. Infrastructure improvements to provide accessible design in accordance with the Americans with Disabilities Act have taken place on 29 locations within the North Valley area, using CDBG funds of approximately \$120,000.
- In 2008, Booker Elementary school, which is within walking distance of the Buena Vista Springs Apartments, reopened its new facility funded through bonds in excess of \$27 million after being temporarily housed in mobile trailers. The new facility is a world class, state of the art elementary empowerment school that received an “outstanding” assessment on its standardized testing from the Clark County School District in its first year of operation. Gilbert Magnet School for Communication and Creative Arts is located within the neighborhood and is the recipient of the Dr. Ronald Simpson Distinguished Merit Award as the top magnet school in the nation. In 2006, adjacent to the neighborhood, the One Hundred Academy of Excellence was established. This private school was established to offer parents a choice of schools to select in the community. It encompasses standards of excellence teaching students to excel academically and in all endeavors.
- The nearby Dr. William Pearson Recreation Center opened in 2008 with recreational resources, meeting rooms, computer labs and other amenities. Approximately \$8 million in CDBG funds were used in developing this project. Walker Park, a small city park is located near the target area, but represents the only other recreational feature in the area.
- The Martin Luther King, Jr. Senior Center is also located nearby. This center provides health, nutrition and life-skills training as well as home repair and modification, nutritious meals, transportation, socialization and recreation opportunities for more than 800 low-income seniors each year. Construction of this Center utilized over \$1.8 million in CDBG funds.

- Through Habitat for Humanity, six single-family homes for low-income families were newly constructed across the street from Buena Vista Springs. Over \$300,000 in Low Income Housing Trust Fund and CDBG funds were used to complete this project.
- Neighborhood Housing Services of Southern Nevada has been allocated \$200,000 in CDBG funds with a contribution from Wells Fargo Bank of \$85,000 for purchase, rehabilitation and resale of foreclosed properties in North Valley.
- The State of Nevada Housing Division selected this neighborhood for investment of its American Reinvestment and Recovery Act (ARRA) of 2009 Weatherization Assistance Program (WAP) funds used to make existing homes with lower income households more energy efficient.

In total, these projects represent over \$81 million in leveraged public and private funds recently invested or planned for the Buena Vista Springs target area or in close proximity to the area.

In 2006, the Nevada Bankers Collaborative selected North Valley as a project worthy of committing their financial and human resources. This commitment laid the foundation upon which an innovative and viable collaboration was built. A revitalization task force was formed made up of local citizens, City of North Las Vegas staff, the Urban League, United Way and the Nevada Bankers Collaborative. From the task force, the North Valley Leadership team emerged made up of residents from the neighborhood. One of the primary goals of the leadership team was the demolition of Buena Vista Springs Apartments to rid the community of the blight and crime associated with that project. By demolishing this project, anticipated benefits are the reduction of crime, increase in health and safety and stabilization of the tax credit properties under direction of the State of Nevada located in the same area.

Economic development activities designed to increase opportunities and jobs are currently underway and are encompassed in the State of Nevada initiated Southern Nevada Enterprise Community planning process. The State of Nevada Housing Division, in addition to providing financial support to this project with NSP3 funds, is also proposing to partner with one or more local non-profit agencies for acquisition, rehabilitation and resale/rental of foreclosed and abandoned homes in the neighborhood surrounding Buena Vista Springs. Fourteen homes will be acquired, rehabilitated and resold to households at or below 120% AMI with a proposed budget of \$1,050,000 in NSP3 funds. An additional three homes will be acquired and rehabilitated for rental to households at or below 50% AMI with a proposed budget of \$350,000 in NSP3 funds.

The City of North Las Vegas is also submitting a Neighborhood Revitalization Strategy Area proposal to the Department of Housing and Urban Development to benefit this neighborhood. Additional efforts to stabilize the neighborhood include on-going collaborations with the Urban League, the Nevada Bankers Collaborative, Communities in Schools and Nevada Partners, Incorporated.

REQUEST FOR WAIVER OF 10 PERCENT RULE FOR DEMOLITION

Demolition will exceed the allowable 10 percent cap under the NSP3 notice and the City of North Las Vegas and Clark County are hereby requesting a waiver of this cap from the Department of Housing and Urban Development (HUD). The total amount estimated for demolition of the 288 units is \$2,126,200 which is 10.50% of the total NSP3 budget for Clark County and North Las Vegas. This exceeds the cap by only 0.50% and obtaining the waiver from HUD will serve in making an important redevelopment project feasible.

As stated above, demolition of this project will immediately relieve the community of an extremely unhealthy, unsafe eyesore which is a source of crime, and a drain on an already economically distressed

neighborhood. By acquiring this foreclosed-upon property and demolishing the dilapidated structures it is anticipated that the two adjacent tax credit affordable housing projects, one occupied by senior citizens, will begin to stabilize and provide a safer environment. Further, the values of both tax credit assisted projects will be enhanced, especially once the property is redeveloped with new affordable housing units. Demolition further supports the community investment already in place through Booker Elementary School, Gilbert Magnet School, One Hundred Academy of Excellence, Dr. Pearson Recreation Center, Martin Luther King, Jr. Senior Center and the Nevada Bankers Collaborative. Demolition is in line with the directives of the City Council of the City of North Las Vegas and the North Valley Leadership Team.

2. Definitions and Descriptions

Definitions

Term	Definition
Blighted Structure	<p>“Blighted Structure” is defined based on Title 18, Chapter 231 in Nevada Revised Statutes, which defines a blighted urban area. Combining this definition with the definition of “structure” provides the definition of blighted structure.</p> <p>A blighted structure is a structure that is used or intended to be used for residential, commercial, industrial or other purposes, or any combination thereof, which is unfit or unsafe for those purposes and is conducive to ill health, transmission of disease, infant mortality, juvenile delinquency or crime because of one or more of the following factors:</p> <ul style="list-style-type: none"> ✓ Defective design and character of physical construction. ✓ Faulty arrangement of the interior and spacing of buildings. ✓ Overcrowding. ✓ Inadequate provision for ventilation, light, sanitation, open spaces and recreational facilities. ✓ Age, obsolescence, deterioration, dilapidation, mixed character or shifting of uses.
Affordable Rents	<p>“Affordable rents” follow the HOME program standards at 24 CFR 92.252 (a), (c), (e), and (f). Namely, the maximum rents will be the lesser of the fair market rent and up to 30% of the adjusted income of a family earning 65% of AMI, with adjustments for the number of bedrooms in the unit, less a utility allowance. Affordable rents for units designated for households with incomes below 50% of AMI will be no more than 30% of 50% of AMI, adjusted for unit size. Such rents may be increased annually after HUD updates fair market rents and median incomes.</p>

Descriptions

Term	Definition
Long-Term Affordability	<p>“Long-Term Affordability” will be in accordance with the HOME program standards at 24 CFR 92.252(a), (c), (e), and (f) for rental properties and 24 CFR 92.254 for homeownership housing. Using the HOME program affordability periods will provide for a minimum length of affordability; however, the County may require longer affordability periods that exceeds the HOME program requirements as the NSP program evolves. Affordability periods will be enforced through grant agreements with nonprofit subgrantees, and a Deed of Trust with the public jurisdiction as Trustee and Beneficiary.</p>
Housing Rehabilitation Standards	<p>NSP Rehab Standards for Rental and Homeownership – effective June 8, 2010</p> <p>See website for link to full document: http://www.clarkcountynv.gov/Depts/finance/crm/Pages/NSP.aspx</p> <p>These standards require minimum repair and replacement standards in order to improve home performance through the use of energy efficient technologies/materials, to improve water conservation, and to utilize renewable energy sources. The rehabilitation of single family homes will meet these standards to ensure the standard for Energy Star Qualified New Homes as required by the NSP3 Notice. Energy retrofits will also ensure that all products and appliances used meet Energy Star standards and requirements.</p> <p>All properties rehabbed with NSP3 funds will undergo energy audit testing prior to the start of rehab (Test In) in order to aid in the development of the scope of work as well as after the completion of rehab (Test Out) in order to determine the level of home performance achieved through rehabilitation. This testing will be performed by an auditor certified as a HERS/RESNET rater as well a certified Building Performance Institute (BPI) Building Analyst.</p> <p>In addition, all properties will meet local health/safety building code requirements prior to occupancy.</p>

3. Low-Income Targeting

Low-Income Set-Aside Amount

<p>Identify the estimated amount of funds appropriated or otherwise made available under the NSP3 to be used to provide housing for individuals or families whose incomes do not exceed 50 percent of area median income.</p>
<p>Response:</p> <p>Total low-income set-aside percentage (must be no less than 25 percent): 25.92%</p> <p>Total funds set aside for low-income individuals = \$5,250,000</p>

Meeting Low-Income Target

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

Response:

With an estimated 814,868 housing units in Clark County, there are currently 20,552 units available as housing with a continued affordability period, and an additional 577 units of housing currently under construction. This represents only 2.6% of our market and is predominantly multi-family housing. Based upon 2000 Census data and estimates of housing burden in our region (households paying more than 30% of income on rent), there is a need for 11,623 additional affordable rental housing units in our market.

In order to meet HUD’s requirement of a minimum of 25% of NSP3 funds used to assist low income households (at or below 50% AMI) as well as to meet the rental housing preference requirement of the Dodd-Frank Act, a total of \$5,250,000 (25.92%) is allocated to the Acquisition Rehabilitation and Rental program. With these funds and estimates of property purchase prices and rehab expenses, this activity will provide for 35 units of affordable rental housing (single family homes). All homes acquired and rehabbed under this activity will be rented to households earning no more than 50% AMI and will have a required affordability period enforced by a Deed of Trust. Although this activity represents just a fraction of the total affordable housing needed County-wide, this activity will provide much needed affordable rental opportunities for families in single family homes with 2-5 bedrooms. This activity intends to build upon an existing portfolio of scattered-site single family home properties maintained by the Southern Nevada Regional Housing Authority as well as their current waiting list of NSP-eligible tenants.

When faced with a choice between a qualified contractor/job applicant located from within one of the NSP3 target areas and a qualified contractor/job applicant located from outside of the NSP3 target area, Clark County and North Las Vegas (as well as all applicable subgrantees who hire for NSP3 funded projects) will select the qualified contractor/job applicant from inside the target area. The vicinity hiring requirement will be addressed through all NSP3 activities including Administration as described in Section 6 below.

4. Acquisition and Relocation

Demolition or Conversion of LMI Units

Does the grantee intend to demolish or convert any low- and moderate-income dwelling units (i.e., ≤ 80% of area median income)?	YES – Buena Vista Springs (Activity #4)
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If yes, fill in the table below.

Question	Number of Units
The number of low- and moderate-income dwelling units—i.e., ≤ 80% of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.	288
The number of NSP affordable housing units made available to low-, moderate-,	

and middle-income households—i.e., ≤ 120% of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).	N/A – Land Bank
The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.	N/A – Land Bank

5. Public Comment

Citizen Participation Plan

<p>Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment or abbreviated plan.</p> <p><u>Response:</u> Clark County and North Las Vegas conducted numerous activities in order to facilitate citizen participation in the development of the NSP3 plan in accordance with each jurisdiction’s citizen participation plans. These activities included:</p> <ul style="list-style-type: none"> • Meeting with NSP1 nonprofit subgrantees – December 15, 2010 • Survey of NSP1 grantees – September 10, 2010 • County staff introduced NSP3 to the Clark County Community Development Advisory Committee (CDAC) - January 18, 2011 • Board of County Commissioners (BCC) meeting for BCC direction on the NSP3 Substantial Amendment - January 18, 2011 • Briefings conducted with North Las Vegas City Council January 17 and 18, 2011 to seek direction for use of NSP3 funding • North Las Vegas Special City Council meeting to propose the Buena Vista Springs project – January 19, 2011 • Briefings conducted with County Commissioners January 27 and 28, 2011 to seek information specific to their district particularly within the context of the proposed NSP3 target areas • North Las Vegas City Council meeting to approve the Buena Vista Springs project – February 2, 2011 • A draft of the Substantial Amendment was posted on Clark County’s website on February 3, 2011 posted at: http://www.clarkcountynv.gov/Depts/finance/crm/Pages/NSP.aspx • North Las Vegas provided a link to the Clark County website for the draft of the Amendment through http://www.cityofnorthlasvegas.com/Departments/CommunityDevelopment/NeighborhoodServices.shtm • An email notice to parties who have expressed an interest in NSP since the initial planning of the first round of NSP planning (NSP1) was sent on February 3, 2011 to notify them of the draft posting and to solicit comment. This email list includes over 300 local individuals, businesses and nonprofit organizations • A public notice soliciting comments on the proposed Amendment to the FY 2010 Annual Action Plan and FY 2010-2014 Consolidated Plan for the third round of Neighborhood Stabilization Program funds (NSP3) was published on February 4, 2011 in the Las Vegas Review Journal. This notice solicits public comment during an 18 day comment period beginning February 4 and ending February 21, 2011. The same notice was published in The Las Vegas Sentinel Voice (Nevada’s only African-American community newspaper) on February 10, 2011 and El Tiempo
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(Spanish language newspaper) on February 11, 2011.

- Clark County and North Las Vegas staff met with County Commissioner Liaisons to discuss proposed NSP3 activities and target areas and answer their questions – February 10, 2011
- North Las Vegas staff meeting with North Valley Leadership Team – February 12, 2011
- North Las Vegas staff meeting with Nevada Bankers Collaborative – February 17, 2011
- Clark County staff presented the draft of the Amendment through a Public Hearing on February 15, 2011. The Board of County Commissioners approved the Amendment and authorized staff to submit to HUD by the March 1 deadline.
- Article regarding the proposed Buena Vista Springs project (Activity 4) was published in The Las Vegas Review-Journal - February 20, 2011
- The final Amendment approved by the Board of County Commissioners will be posted to Clark County’s website <http://www.clarkcountynv.gov/Depts/finance/crm/Pages/NSP.aspx> on the same day as it is submitted to HUD (February 28, 2011) and any comments received during the public comment period included as an attachment.

Summary of Public Comments Received.

The summary of public comments received is included as an attachment (Exhibit F).

6. NSP Information by Activity

A summary of the total NSP3 budget for all activities is included as an attachment (Exhibit E).

Activity Number 1											
Activity Name	Acquisition Rehab for Rental of Single Family Homes – Clark County										
Uses	Select all that apply: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td>Eligible Use A: Financing Mechanisms</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Eligible Use B: Acquisition and Rehabilitation</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td>Eligible Use C: Land Banking</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td>Eligible Use D: Demolition</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td>Eligible Use E: Redevelopment</td> </tr> </table>	<input type="checkbox"/>	Eligible Use A: Financing Mechanisms	<input checked="" type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation	<input type="checkbox"/>	Eligible Use C: Land Banking	<input type="checkbox"/>	Eligible Use D: Demolition	<input type="checkbox"/>	Eligible Use E: Redevelopment
<input type="checkbox"/>	Eligible Use A: Financing Mechanisms										
<input checked="" type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation										
<input type="checkbox"/>	Eligible Use C: Land Banking										
<input type="checkbox"/>	Eligible Use D: Demolition										
<input type="checkbox"/>	Eligible Use E: Redevelopment										
CDBG Activity or Activities	24 CFR 570.201(a) – Acquisition, 24 CFR 570.202 - Rehab										
National Objective	Low-income Housing to Meet 25% Set Aside (LH25)										
Activity Description	<p>Clark County will partner with the Southern Nevada Regional Housing Authority (SNRHA) to expand its current supply of scattered-site single family rental housing affordable to households at or below 50% AMI. This activity will meet the 25% set aside requirement for low income households as well as the requirement for rental preference established in the Dodd-Frank Act. Affordable rents will follow the HOME program requirements as defined above. SNRHA has significant experience with property development, asset management, and tenant qualification through NSP1 as well as other Federal housing programs.</p> <p>Subject to approval by the SNRHA Board of Directors, SNRHA will purchase a minimum of 35 foreclosed single family properties at a minimum 1% discount from fair market value within the Winchester target area, rehab those properties to NSP rehab standards, and maintain the homes as affordable</p>										

	<p>rental housing. The affordability period will be enforced through a subrecipient grant agreement as well as a Deed of Trust recorded upon initial acquisition of the property. The tenure of all beneficiaries will be rental housing with a lease for a minimum of 12 months.</p> <p>This activity is designed to improve the condition of aging housing stock, provide additional affordable rental housing opportunities for families, decrease vacancy through rental tenure, and ensure responsible and energy efficient property maintenance in the long-run. As of 12/31/10, the SNRHA has a current waiting list of over 200 potential tenants that meet the requirements of NSP. Not all of these tenants will be served by the supply of housing provided under NSP1 therefore additional housing opportunities are needed to continue to meet the needs of those citizens. This activity will take place in the same target area as Activity #2 (Acquisition Rehab for Homeownership) in order to maintain a mixed-income community. However, of the total amount of funds planned for the Winchester target area, the majority of those funds (57%) will be dedicated to rental housing. This meets the NSP3 low income set aside requirement as well as documents a preference for affordable housing as required by the Dodd-Frank Act.</p> <p>In order to ensure access to properties, Clark County will continue its partnership with the National Community Stabilization Trust (NCST) to facilitate the purchase of foreclosed and vacant single family properties from Sellers at the required discount. The “First-look” opportunity provided by the Sellers working through NCST is essential for program success due to heavy competition from investors.</p> <p>Should opportunities for hiring exist to facilitate the implementation of this activity, Clark County staff as well as SNRHA will provide for the hiring of employees/contractors who reside in the target area to the greatest extent possible. This requirement will be specified in the written grant agreement between Clark County and SNRHA and subject to regular program monitoring. It is anticipated that significant marketing and outreach efforts will be conducted through local businesses, the Winchester Cultural Center as well as the Winchester Town Board to assist with these efforts as hiring opportunities become available, particularly with respect to construction staff hired to perform property rehabilitation.</p>	
Location Description	Winchester – Clark County Neighborhood ID: 2785827 Please refer to AREAS OF GREATEST NEED description above for further information regarding this target area.	
Budget	Source of Funding	Dollar Amount
	NSP3	\$5,250,000
Total Budget for Activity	\$5,250,000	
Performance Measures	35 foreclosed single family homes to be acquired and rehabbed to NSP rehab standards	

	35 beneficiary households at 50% and below AMI adjusted for family size	
Projected Start Date	June 2011	
Projected End Date	January 2013	
Responsible Organization	Name	Clark County – Community Resources Management Division
	Subrecipient	Southern Nevada Regional Housing Authority
	Location	500 S. Grand Central Parkway, Box 551212 Las Vegas, NV 89155-1212
	Administrator Contact Info	Lyndee Cichon – Grants Coordinator lyndee@ClarkCountyNV.gov 702-455-5025

Activity Number 2	
Activity Name	Acquisition Rehab for Resale of Single Family Homes - Clark County
Use	Select all that apply: <input type="checkbox"/> Eligible Use A: Financing Mechanisms <input checked="" type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation <input type="checkbox"/> Eligible Use C: Land Banking <input type="checkbox"/> Eligible Use D: Demolition <input type="checkbox"/> Eligible Use E: Redevelopment
CDBG Activity or Activities	24 CFR 570.201(a) – Acquisition,(b) Disposition, (n) Direct Homeownership 24 CFR 570.202 - Rehab
National Objective	Low Moderate Middle Income Housing (LMMH)
Activity Description	<p>Clark County will partner with one or more nonprofit housing Developers to acquire foreclosed single family homes (at a minimum discount of 1% from fair market value) within the Winchester target area, rehabilitate to NSP rehab standards, and the sell to an NSP-eligible homebuyer between 50% and 120% AMI. Homes will be sold the lesser of a) fair market value as determined by an after-rehab appraisal or b) the total amount of NSP3 funds expended to acquire, rehabilitate and redevelop the property.</p> <p>Up to \$14,999 per household will be available to assist with closing costs, up to 50% of the lender’s required downpayment, and principal reduction as needed to make the monthly mortgage payment affordable (less than 30% of the homebuyer’s gross monthly income). Direct assistance will be provided in the form of a forgivable loan at zero percent interest with a five year affordability period secured by a Deed of Trust with a recapture provision. All homebuyers must qualify for a conventional or government first mortgage with a fixed rate and a 30 year term and agree to occupy the home as their principal residence. In addition, all homebuyers will be required to attend a minimum of 8 hours of housing counseling from a HUD-certified agency in order to be eligible for the program.</p> <p>Direct homebuyer assistance as well as Seller’s closing costs will be deducted from the resale proceeds, and all remaining proceeds will be considered</p>

	<p>program income to be returned to Clark County for use on NSP3 eligible activities. <u>Resale proceeds are estimated to generate approximately 40% of the initial activity budget, or \$1.6 million.</u> With an estimated resale price of \$100,000 per home, this activity will also leverage over \$2 million in private mortgage financing.</p> <p>This activity is designed to improve the condition of aging housing stock, provide affordable housing for new homebuyers and stabilize median market values in the long run. Homebuyers are required to occupy the property as their principal residence in order to provide stability to the neighborhood as well as ongoing property maintenance. In order not to concentrate any one type of housing within a small area, this activity will take place in the same target area as the Acquisition Rehab Rental program (Activity #1).</p> <p>In order to ensure access to properties, Clark County will continue its partnership with the National Community Stabilization Trust (NCST) to facilitate the purchase of foreclosed and vacant single family properties from Sellers at the required discount. The “First-look” opportunity provided by the Sellers working through NCST is essential for program success due to heavy competition from investors.</p> <p>Should opportunities for hiring exist to facilitate the implementation of this activity, Clark County staff as well the Developer partner(s) will provide for the hiring of employees/contractors who reside in the target area to the greatest extent possible. This requirement will be specified in the written grant agreement between Clark County and the Developer(s) and subject to regular program monitoring. In conjunction with Activity #1, it is anticipated that significant marketing and outreach efforts will be conducted through local businesses, the Winchester Cultural Center as well as the Winchester Town Board to assist with these efforts as hiring opportunities become available, particularly with respect to construction staff hired to perform property rehabilitation.</p>	
Location Description	Winchester – Clark County Neighborhood ID: 2785827 Please refer to AREAS OF GREATEST NEED description above for further information regarding this target area.	
Budget	Source of Funding	Dollar Amount
	NSP3	\$4,000,000
Total Budget for Activity	\$4,000,000	
Performance Measures	25 foreclosed single family homes to be acquired and rehabbed to NSP rehab standards 25 beneficiary households at 120% and below AMI adjusted for family size	
Projected Start Date	June 2011	
Projected End Date	January 2013	
Responsible Organization	Name	Clark County – Community Resources Management Division

	Nonprofit Developer partner(s)	Nonprofit Developer partner(s) to be determined through a competitive RFP process
	Location	500 S. Grand Central Parkway, Box 551212 Las Vegas, NV 89155-1212
	Administrator Contact Info	Lyndee Cichon – Grants Coordinator lyndee@ClarkCountyNV.gov 702-455-5025

Activity Number 3	
Activity Name	Homebuyer Assistance Program - Clark County
Use	Select all that apply: <input type="checkbox"/> Eligible Use A: Financing Mechanisms <input checked="" type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation <input type="checkbox"/> Eligible Use C: Land Banking <input type="checkbox"/> Eligible Use D: Demolition <input type="checkbox"/> Eligible Use E: Redevelopment
CDBG Activity or Activities	24 CFR 570.201(n) Direct Homeownership
National Objective	Low Moderate Middle Income Housing (LMMH)
Activity Description	<p>This activity is designed to enable moderate and middle income households (up to 120% AMI adjusted for family size) with the purchase of foreclosed single family homes before the effects of foreclosure, vacancy and vandalism result in the need for rehabilitation. Related outcomes will include the provision of affordable housing for new homebuyers and stabilized median market values in the long run. It is estimated that many of the homebuyers participating in this program will be first-time homebuyers (although that will not be a requirement of the program). Homebuyers are required to occupy the property as their principal residence in order to provide stability to the neighborhood as well as ongoing property maintenance.</p> <p>Through the provision of both housing counseling and direct financial assistance, new homebuyers will purchase and occupy foreclosed single family homes within the target area of Southwest Clark County. All properties must be purchased at a minimum discount of 1% below fair market value as determined by an appraisal. Up to \$14,999 per household will be available to assist with closing costs, up to 50% of the lender’s required downpayment, and principal reduction as needed to make the monthly mortgage payment affordable (less than 30% of the homebuyer’s gross monthly income). Direct assistance will be provided in the form of a forgivable loan at zero percent interest with a five year affordability period secured by a Deed of Trust with a recapture provision. All homebuyers must qualify for a conventional or government first mortgage with a fixed rate and a 30 year term. In addition, all homebuyers will be required to attend a minimum of 8 hours of housing counseling from a HUD-certified agency in order to be eligible for the program. Rehab will not be provided with NSP funds under this activity</p>

	<p>therefore all properties must meet local code prior to purchase.</p> <p>This activity provides for the widest possible impact with a relatively smaller budget. Assistance will be provided to a minimum of 175 households. With an estimated average purchase price of \$120,000, it is estimated that this activity will leverage over \$18 million in first mortgage financing. Nonprofit program administrators will be selected through an RFP process following HUD approval of the NSP3 substantial amendment.</p> <p>Should opportunities for hiring exist to facilitate the implementation of this activity, Clark County staff as well as their nonprofit subgrantees will provide for the hiring of employees who reside in the target area to the greatest extent possible. This requirement of subrecipients will be specified in the RFP process as well as in the written grant agreement. It is anticipated that small businesses and other local community organizations such as hospitals, churches, and schools will play an integral role in the outreach and advertisement of this program to the community.</p> <p>New homeowners in the area (who have an affordable mortgage payment) will positively contribute to the stabilization of the local retail industry which continues to struggle from the effects of the recession. Concerted efforts to engage local real estate professionals as well as lending institutions informed about NSP will be an essential strategy for the success of this activity. Clark County will explore strategic partnership opportunities for a consumer-driven homeownership model with the National Community Stabilization Trust in order to ensure ample participation from Sellers within the parameters of all program requirements.</p>	
Location Description	Southwest Clark County Neighborhood ID: 6897460 Please refer to AREAS OF GREATEST NEED description above for further information regarding this target area.	
Budget	Source of Funding	Dollar Amount
	NSP3	\$2,625,000
Total Budget for Activity	\$2,625,000	
Performance Measures	175 households between 50% and 120% AMI adjusted for family size will receive direct financial assistance as well as homebuyer counseling in order to purchase a home.	
Projected Start Date	June 2011	
Projected End Date	January 2014	
Responsible Organization	Name	Clark County – Community Resources Management Division
	Nonprofit Partners	Nonprofit partners must be HUD-certified housing counseling agencies and will be selected through a competitive RFP process
	Location	500 S. Grand Central Parkway, Box 551212

		Las Vegas, NV 89155-1212
	Administrator Contact Info	Lyndee Cichon – Grants Coordinator lyndee@ClarkCountyNV.gov 702-455-5025

Activity Number 4	
Activity Name	Buena Vista Springs – North Las Vegas
Use	Select all that apply: <input type="checkbox"/> Eligible Use A: Financing Mechanisms <input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation <input checked="" type="checkbox"/> Eligible Use C: Land Banking <input type="checkbox"/> Eligible Use D: Demolition <input type="checkbox"/> Eligible Use E: Redevelopment
CDBG Activity or Activities	24 CFR 270.208(a)(1) and 570.483(b)(1) Land Bank
National Objective	Low-Moderate-Middle Income Area Benefit (LMMA)
Activity Description	<p>Clark County will provide financial support to this project through the allocation of Federal NSP3 funds and an Interlocal Agreement to be executed following HUD’s approval of the Substantial Amendment. However all program administration and compliance with Federal requirements will be the responsibility of North Las Vegas.</p> <p>The purpose of this activity is to acquire a foreclosed and dilapidated apartment complex, both northern and southern campuses, and to eliminate blight through demolition of buildings, built in 1965, on both campuses. This property will be acquired, relocated, demolished and land banked until an appropriate affordable housing redevelopment project can be developed and the market recovers. Demolition of these structures will result in immediate elimination of blight, reduced crime, increased health and safety and stabilization of two adjoining tax credit developments under direction of the State of Nevada.</p> <p>Since the City of North Las Vegas has been unable to obtain an accurate rent roll, we are projecting relocation expenses for 40 units with valid leases, according to information received from the current property manager. We anticipate relocating all legal residents. A relocation specialist will be hired following a Request for Proposal for that service and all Uniform Relocation Act and Protecting Tenants at Foreclosure regulations will be followed. The total budget for the activity includes relocation.</p> <p>Due to the severe lack of amenities in this neighborhood, the envisioned redevelopment project is expected to be mixed-income rental housing. The HOME allocation process to determine the number of NSP-eligible units will be used. These units will assist household with incomes at or below 120% of area median income (AMI) with a sufficient number of units assisting households with incomes at or below 50% of AMI as required by NSP3. Affordability restrictions will be based at a minimum on the HOME program</p>

	<p>affordability periods, restricted by a Deed of Trust, with the possibility of longer affordability periods as the redevelopment project evolves. As required by NSP3, a preference for affordable rental housing will be established through the development of a Land Bank Re-Use Plan. This end-use will ensure that the project will ultimately achieve the CDBG National Objective of Low Moderate Middle Income Housing (LMMH).</p> <p>Should opportunities for hiring exist to facilitate the implementation of this activity, North Las Vegas staff will provide for the hiring of employees/contractors who reside in the target area to the greatest extent possible.</p> <p>This activity will improve the availability and quality of affordable rental housing as well as strengthening the neighborhood. This land banking project is located within an area of greatest need and has been assigned a HUD NSP3 Need Score of 20.</p> <p>The total budget estimated for this project to be paid with NSP3 funds is as follows: Acquisition: \$2,200,000 Demolition: \$2,126,200 Relocation: \$2,401,735 Holding/Maintenance: \$125,000 TOTAL: \$6,852,935</p> <p><u>REQUEST FOR WAIVER OF 10 PERCENT RULE FOR DEMOLITION</u></p> <p><u>Demolition will exceed the allowable 10 percent cap under the NSP 3 notice and the City or North Las Vegas and Clark County are hereby requesting a waiver of this cap from the Department of Housing and Urban Development (HUD). The total amount estimated for demolition of the 288 units is \$2,126,200 which is 10.50% of the total NSP3 budget. This exceeds the cap by only 0.50% and obtaining the waiver from HUD will serve in making an important redevelopment project feasible.</u></p> <p>The State of Nevada Housing Division has committed \$500,000 to this project in their NSP3 Substantial Amendment and will execute a pass-through grant agreement upon HUD approval of the Substantial Amendment of both the State of Nevada and Clark County.</p>
<p>Location Description</p>	<p>BUENA VISTA SPRINGS target area – Neighborhood ID # 6240753 BUENA VISTA SPRINGS I: West Street on the west, West Cartier Avenue on the north, North Martin Luther King Boulevard moving on Helen Avenue west to Morton Avenue on the east, West Carey Avenue on the south BUENA VISTA SPRINGS II : Vacant building on a 2.32 acre lot on the west, ½ block north toward Hart Avenue on the north, Comstock Drive on the east, West Lake Mead Boulevard on the south</p>

	Please refer to AREAS OF GREATEST NEED description above for further information regarding this target area and the adjoining neighborhood we are attempting to stabilize.	
Budget	Source of Funding	Dollar Amount
	NSP3 – North Las Vegas	\$3,687,432
	NSP3 – Clark County	\$2,665,503
	NSP3 – State of Nevada	\$500,000
Total Budget for Activity		\$6,852,935
Performance Measures	288 units of housing will be acquired 40 households will be relocated per Uniform Relocation Act requirements 288 units will be demolished following relocation Demolished property to be held as a land bank for less than 10 years	
Projected Start Date	March 2011	
Projected End Date	All NSP3 funds expended by April 2014 for NSP3 eligible activities Land Bank to be redeveloped by March 2021 pursuant to Land Bank Plan	
Responsible Organization	Name	City of North Las Vegas – Housing and Neighborhood Services
	Location	2225 Civic Center Drive, Suite 220, North Las Vegas, NV 89030
	Administrator Contact Info	Kathy Somers Neighborhood Services Manager (702)633-1532 somersk@cityofnorthlasvegas.com

Activity Number 6	
Activity Name	Administration – Clark County and North Las Vegas
Use	Select all that apply: N/A
	<input type="checkbox"/> Eligible Use A: Financing Mechanisms
	<input type="checkbox"/> Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/> Eligible Use C: Land Banking
	<input type="checkbox"/> Eligible Use D: Demolition
<input type="checkbox"/> Eligible Use E: Redevelopment	
CDBG Activity or Activities	Administration and Planning Costs – 24 CFR 270.205 and 24 CFR 270.206
National Objective	N/A
Activity Description	This activity will provide general administrative and planning activities in order to effectively manage the activities undertaken with NSP3 funds. Activities are expected to be conducted by grantee staff as well as through contracted services, subrecipients, Developers and other collaborative partnerships as appropriate. Administrative activities are expected to include: <ul style="list-style-type: none"> • General management, oversight, and coordination

	<ul style="list-style-type: none"> • Program reporting in compliance with all Federal and local requirements to ensure a high degree of program transparency and public information • Program outreach • Procurement of nonprofit subgrantees, professional services and other program partners • Environmental Review of target areas and individual property sites • Labor compliance (Section 3, Davis Bacon, vicinity hiring) • Grants accounting to ensure accurate documentation and allocation of NSP3 costs as well as coordination of financing, reporting, and compliance functions • Timely disbursement of program funds as well as coordination of participating vendors and subgrantees • Property inspections for quality control as well as compliance with local codes and NSP rehab standards • NSP Lender/Realtor trainings • Technical assistance with rehab policies, standards, procedures, specifications and scopes of work • Technical assistance with relocation of tenants for North Las Vegas in compliance with the requirements of the Uniform Relocation Act (Buena Vista Springs) • Technical Assistance with the development of a Land Bank Plan for Re-use in North Las Vegas (Buena Vista Springs) • Professional services to track economic data within NSP3 target areas to provide trend analysis and performance measurement • Professional services to provide energy consumption and efficiency data within the Winchester target area in order to evaluate the effectiveness of energy efficient rehabilitation efforts • Program evaluation and close-out <p>If additional employees are to be hired, Clark County and North Las Vegas will provide outreach to individuals living within NSP3 target areas to the greatest extent possible and within the guidelines of local jurisdiction personnel requirements. When faced with a choice between a qualified contractor/job applicant located from within one of the NSP3 target areas and a qualified contractor/job applicant located from outside of the NSP3 target area, Clark County and North Las Vegas (as well as all applicable subgrantees who hire for NSP3 funded projects) will select the qualified contractor/job applicant from inside the target area to the greatest extent possible.</p>	
Location Description	Clark County and North Las Vegas	
Budget	Source of Funding	Dollar Amount
	NSP3 Clark County	\$1,615,611
	NSP3 North Las Vegas	\$409,715
Total Budget for Activity	\$2,025,326	
Performance Measures	Clark County and North Las Vegas will effectively and efficiently meet all requirements of the NSP3 program and achieve all performance measures identified under each NSP3 activity. 50% of all funds will be expended within	

	2 years following execution of grant agreement with HUD and 100% of all funds will be expended within 3 years following execution of grant agreement with HUD.	
Projected Start Date	April 2011	
Projected End Date	April 2014	
Responsible Organization	Name	Clark County – Community Resources Management Division
	Location	500 S. Grand Central Parkway, Box 551212 Las Vegas, NV 89155-1212
	Administrator Contact Info	Lyndee Cichon – Grants Coordinator lyndee@ClarkCountyNV.gov 702-455-5025

7. Certifications

Certifications for State and Entitlement Communities

- (1) **Affirmatively furthering fair housing.** The jurisdiction certifies that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-displacement and relocation plan.** The applicant certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.
- (3) **Anti-lobbying.** The jurisdiction must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (4) **Authority of jurisdiction.** The jurisdiction certifies that the consolidated plan or abbreviated plan, as applicable, is authorized under state and local law (as applicable) and that the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (5) **Consistency with plan.** The jurisdiction certifies that the housing activities to be undertaken with NSP funds are consistent with its consolidated plan or abbreviated plan, as applicable.
- (6) **Acquisition and relocation.** The jurisdiction certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the notice for the NSP program published by HUD.
- (7) **Section 3.** The jurisdiction certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (8) **Citizen participation.** The jurisdiction certifies that it is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (9) **Following a plan.** The jurisdiction certifies it is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.
- (10) **Use of funds.** The jurisdiction certifies that it will comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act and Title XII of Division A of the American Recovery and Reinvestment Act of 2009 by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.
- (11) **The jurisdiction certifies:**
 - a. that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income; and

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

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

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

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

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

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

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

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


Signature/Authorized Official

2.23.11
Date

Michael J. Pawlak
Manager, Community Resources Management Division
Clark County

**APPLICATION FOR
FEDERAL ASSISTANCE**

OMB Approved No. 3076-0006

Version 7/03

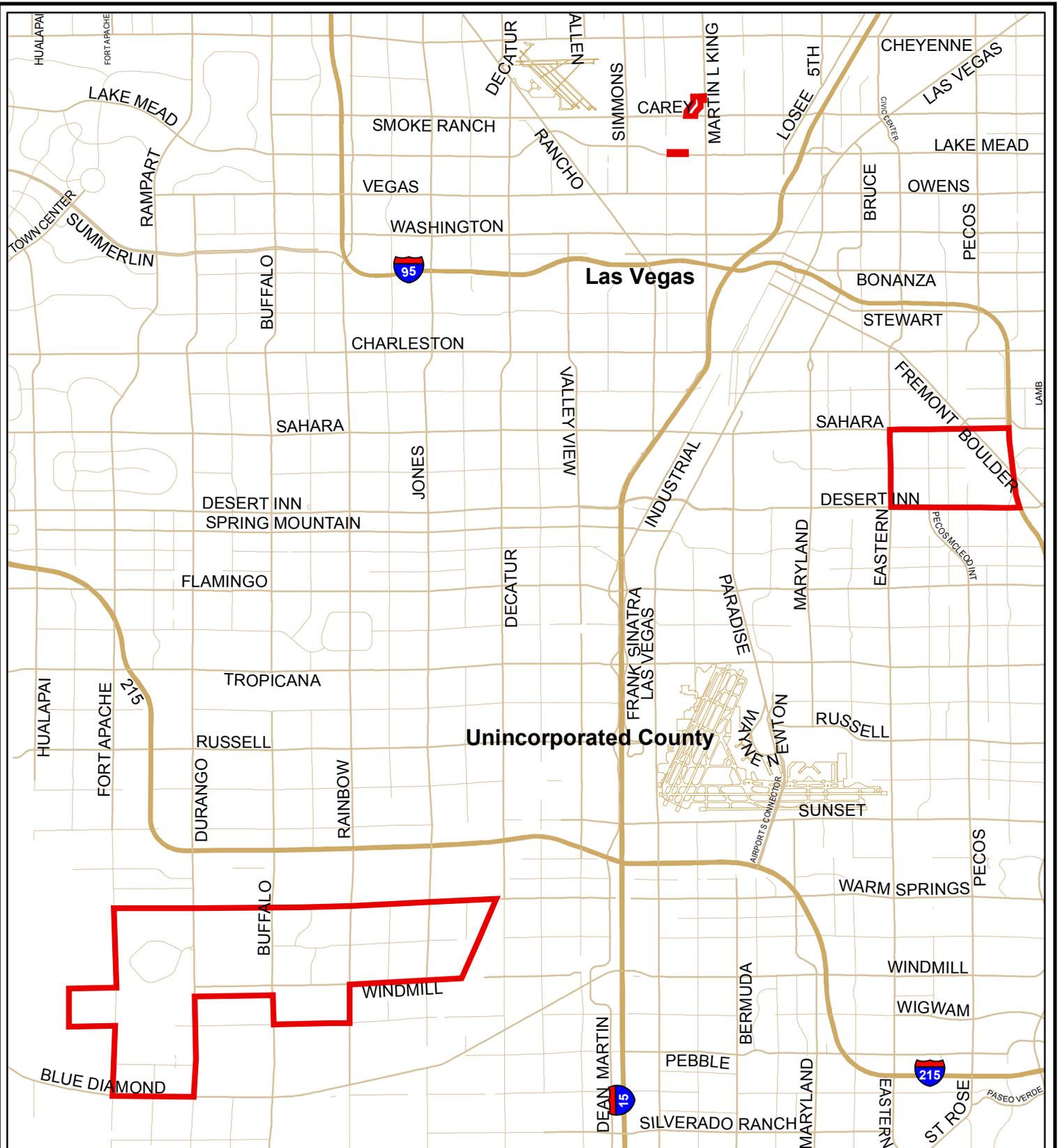
1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction		Pre-application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction	2. DATE SUBMITTED February 28, 2011	Applicant Identifier
			3. DATE RECEIVED BY STATE	State Application Identifier
			4. DATE RECEIVED BY FEDERAL AGENCY February 28, 2011	Federal Identifier
5. APPLICANT INFORMATION				
Legal Name: County of Clark, Nevada		Organizational Unit: Department: Finance		
Organizational DUNS: 083782953		Division: Community Resources Management		
Address: Street: 500 S. Grand Central Parkway PO Box 551212		Name and telephone number of person to be contacted on matters involving this application (give area code)		
City: Las Vegas		Prefix:	First Name: Lyndee	
County: Clark		Middle Name Lloyd		
State: NV		Last Name Cichon		
Zip Code 89155-1212	Suffix:			
Country: USA		Email: lyndee@clarkcountynv.gov		
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 88-6000028		Phone Number (give area code) 702-455-5025	Fax Number (give area code) 702-455-5038	
8. TYPE OF APPLICATION: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) Other (specify) <input type="checkbox"/> <input type="checkbox"/>		7. TYPE OF APPLICANT: (See back of form for Application Types) B. County Other (specify)		
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: TITLE (Name of Program): CDBG Entitlement - Neighborhood Stabilization Program 12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): Clark County and the City of North Las Vegas		9. NAME OF FEDERAL AGENCY: U.S. Department of Housing and Urban Development		
13. PROPOSED PROJECT Start Date: March 1, 2011		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Neighborhood Stabilization Program 3 (NSP3) Acquisition and/or redevelopment of foreclosed and abandoned properties		
Ending Date: April 30, 2014		14. CONGRESSIONAL DISTRICTS OF: a. Applicant 1st (NV1), 2nd (NV2), 3rd (NV3)		
15. ESTIMATED FUNDING:		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?		
a. Federal	\$ 20,253,261.00	a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON		
b. Applicant	\$.00	DATE:		
c. State	\$ 500,000.00	b. No. <input checked="" type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372		
d. Local	\$.00	<input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW		
e. Other	\$.00	17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?		
f. Program Income	\$.00	<input type="checkbox"/> Yes If "Yes" attach an explanation. <input checked="" type="checkbox"/> No		
g. TOTAL	\$ 20,753,261.00			
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.				
a. Authorized Representative				
Prefix	First Name Michael	Middle Name J.		Suffix
Last Name Pawlak		c. Telephone Number (give area code) 702-455-5025		
b. Title Manager, Community Resources Management Division		e. Date Signed 2.23.11		
d. Signature of Authorized Representative <i>Michael J Pawlak</i>				

EXHIBIT A:

Maps of Clark County and North Las Vegas

NSP3 Target Areas

- Regional map showing all three target areas
 - Winchester Target area (Clark County)
 - Southwest Clark County Target Area
- Buena Vista Springs project (North Las Vegas)



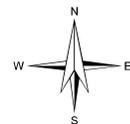
Legend

 NSP 3 Proposed Target Areas

This information is for display purposes only. No liability is assumed as to the accuracy of the data delineated herein.

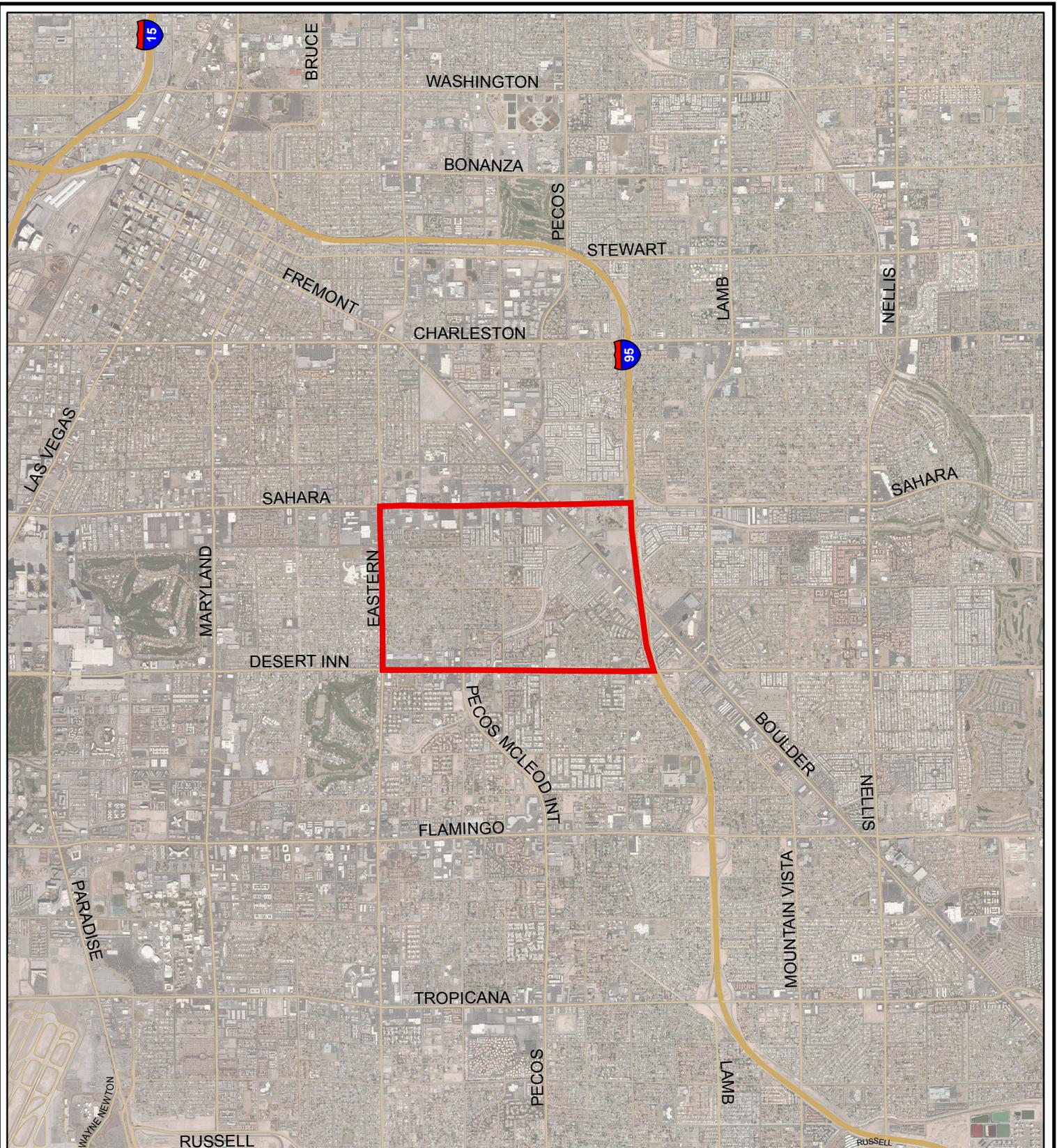
Neighborhood Stabilization Program 3 Target Areas

Clark County, Nevada



Date: February 2, 2011

Vicinity Map
No Scale



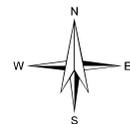
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 NSP 3 Proposed Target Areas

This information is for display purposes only. No liability is assumed as to the accuracy of the data delineated herein.

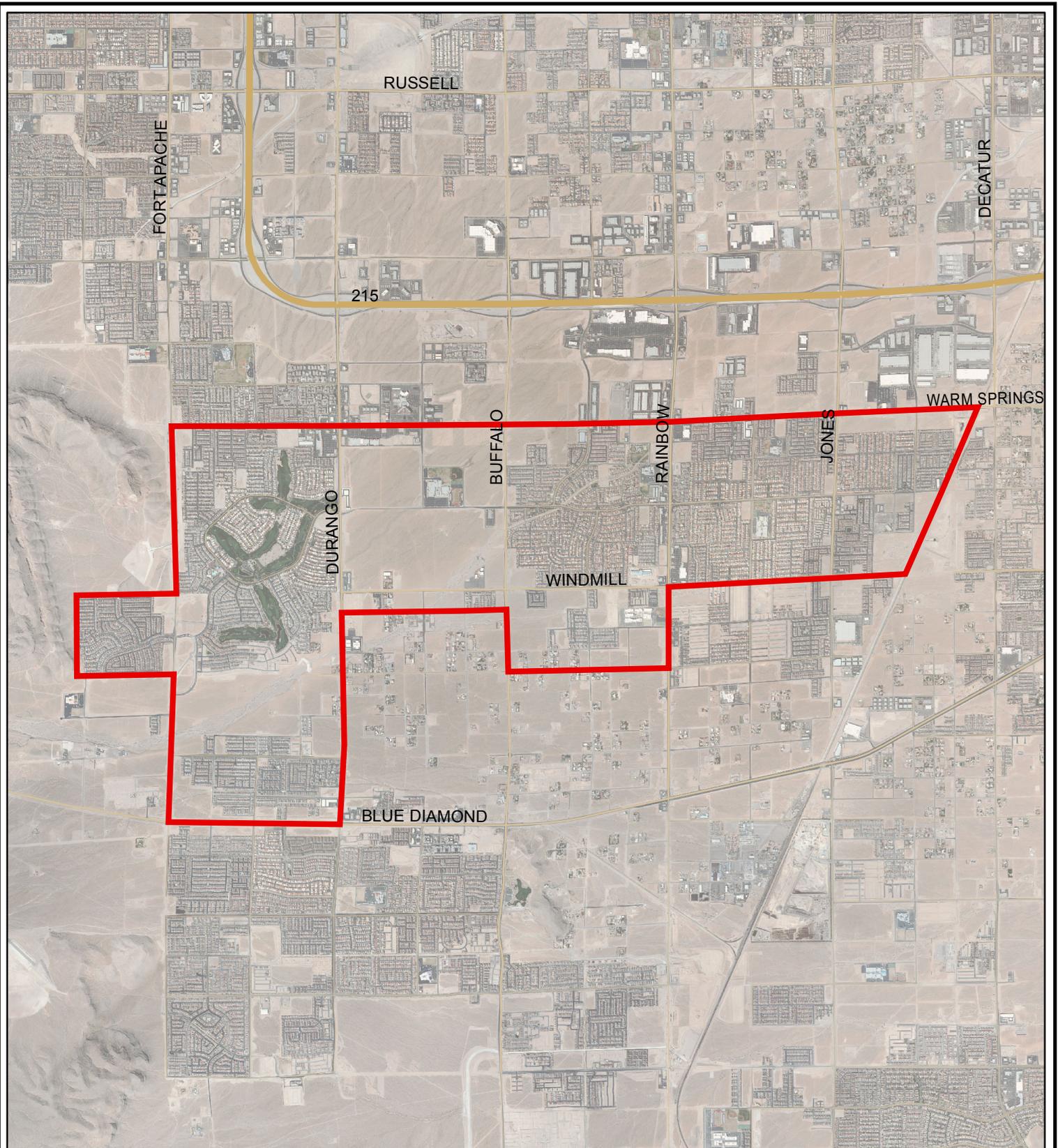
**Neighborhood Stabilization
Program 3
Winchester Target Area**

Clark County, Nevada



Date: February 2, 2011

Vicinity Map
No Scale



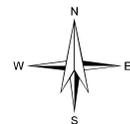
Legend

 NSP 3 Proposed Target Areas

This information is for display purposes only. No liability is assumed as to the accuracy of the data delineated herein.

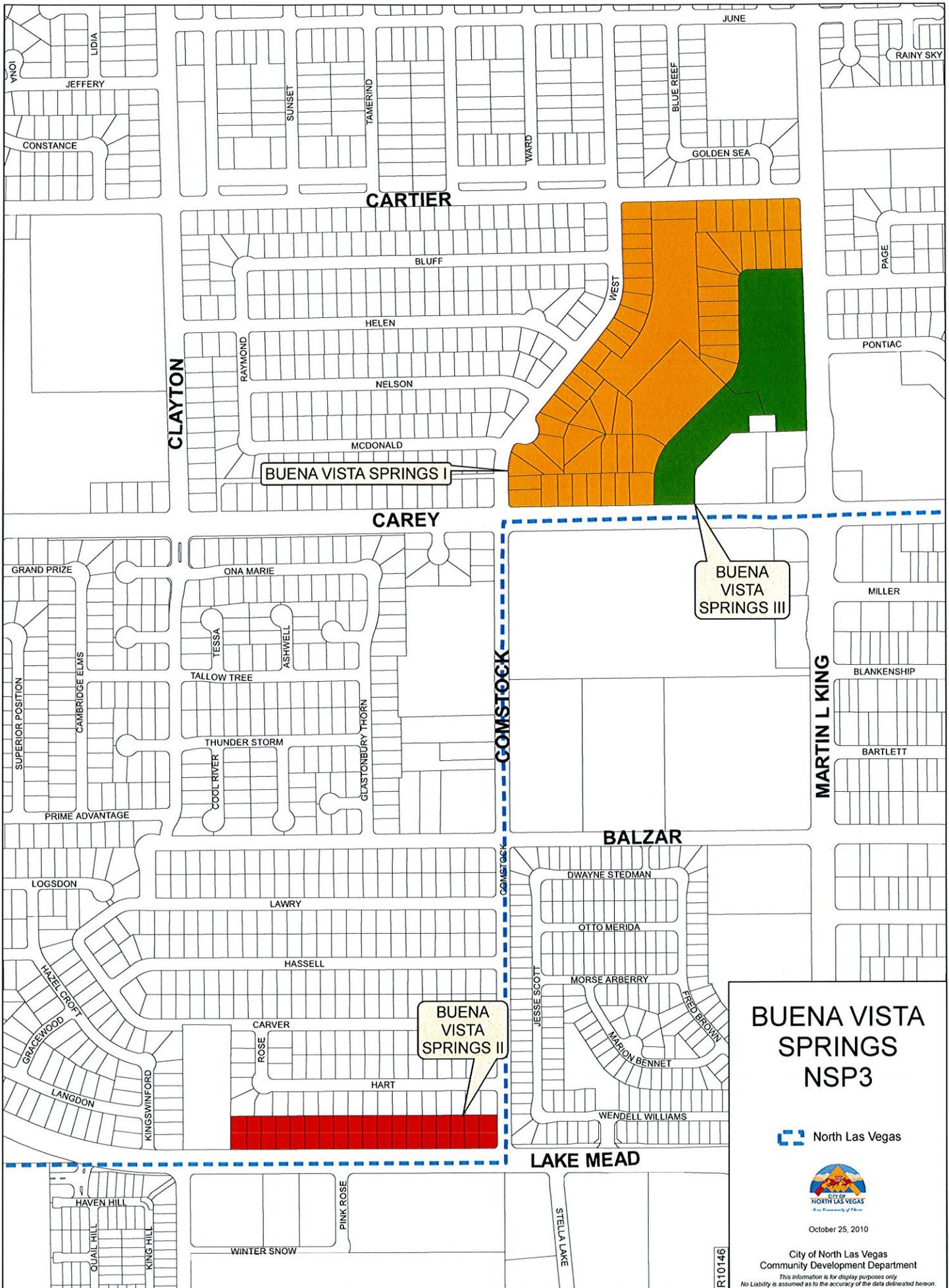
**Neighborhood Stabilization
Program 3
Southwest Target Area**

Clark County, Nevada



Date: February 2, 2011

Vicinity Map
No Scale



BUENA VISTA SPRINGS NSP3

 North Las Vegas



October 25, 2010

City of North Las Vegas
Community Development Department
This information is for display purposes only.
No Liability is assumed as to the accuracy of the data delineated hereon.

R10146

EXHIBIT B:

NSP3 Planning Data from the HUD NSP3 Mapping Tool for Preparing Action Plan website

- Winchester - Clark County
 - Southwest Clark County
- BVS Area (Buena Vista Springs – North Las Vegas)

FRIDAY, FEBRUARY 25, 2011



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Neighborhood Stabilization Program Grants

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

Enter an Address, city or state Go

Select a State Select a County Go

Map Options : Clear | Reset

Click Mode: Zoom | Info

NSP3 Legend (%): Tract Outline

LOG OUT

Click here for an Overview

NSP3 Options

14 Current Zoom Level

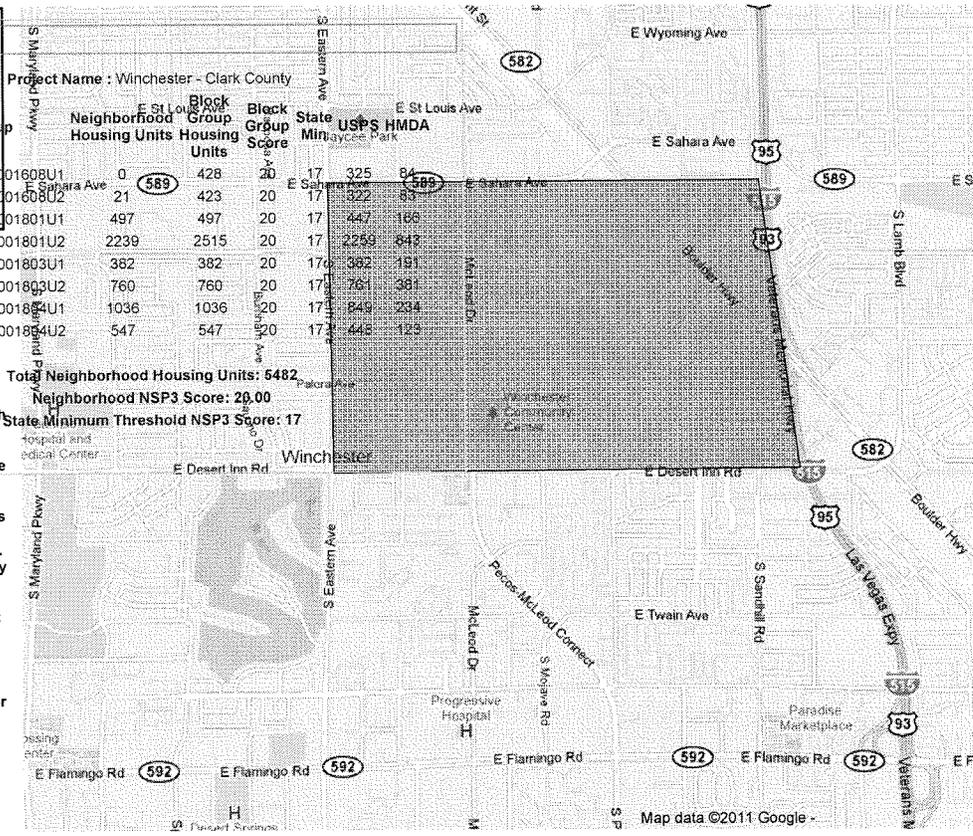
Show Tracts Outline (Zoom 11+)

VIEW DATA

VIEW PROJECTS

METHODOLOGY

INSTRUCTIONS



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

Neighborhood ID: 2785827

NSP3 Planning Data

Grantee ID: 3200300C

Grantee State: NV

Grantee Name: CLARK COUNTY

Grantee Address: 500 S. Grand Central parkway Las Vegas NV 89106

Grantee Email: lyndee@co.clark.nv.us

Neighborhood Name: Winchester - Clark County

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

NSP3 Score

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

Neighborhood NSP3 Score: 20

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 5482

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 70.61

Percent Persons Less than 80% AMI: 48.95

Neighborhood Attributes (Estimates)

Vacancy Estimate

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

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

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

USPS Residential Addresses in Neighborhood: 4914

Residential Addresses Vacant 90 or more days (USPS, March 2010): 230

Residential Addresses NoStat (USPS, March 2010): 33

Foreclosure Estimates

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

Total Housing Units to receive a mortgage between 2004 and 2007: 1850

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 35.34

Percent of Housing Units 90 or more days delinquent or in foreclosure: 24.91

Number of Foreclosure Starts in past year: 306

Number of Housing Units Real Estate Owned July 2009 to June 2010: 166

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

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 61

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -50.7

Place (if place over 20,000) or county unemployment rate June 2005*: 4

Place (if place over 20,000) or county unemployment rate June 2010*: 14.1

*Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

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

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

Latitude and Longitude of corner points

-115.118694 36.144252 -115.091743 36.144390 -115.089254 36.129834 -115.118437 36.129626

Blocks Comprising Target Neighborhood

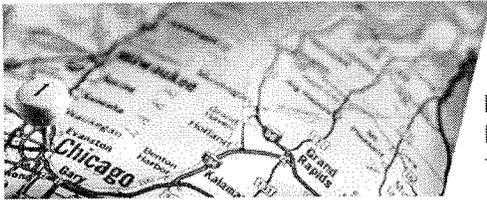
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Neighborhood Stabilization Program Grants

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

Enter an Address, city or state Go

Select a State Select a County Go

Map Options : Clear | Reset

Click Mode: Zoom | Info

NSP3 Legend (%): Tract Outline

LOG OUT

[Click here for an Overview](#)

NSP3 Options

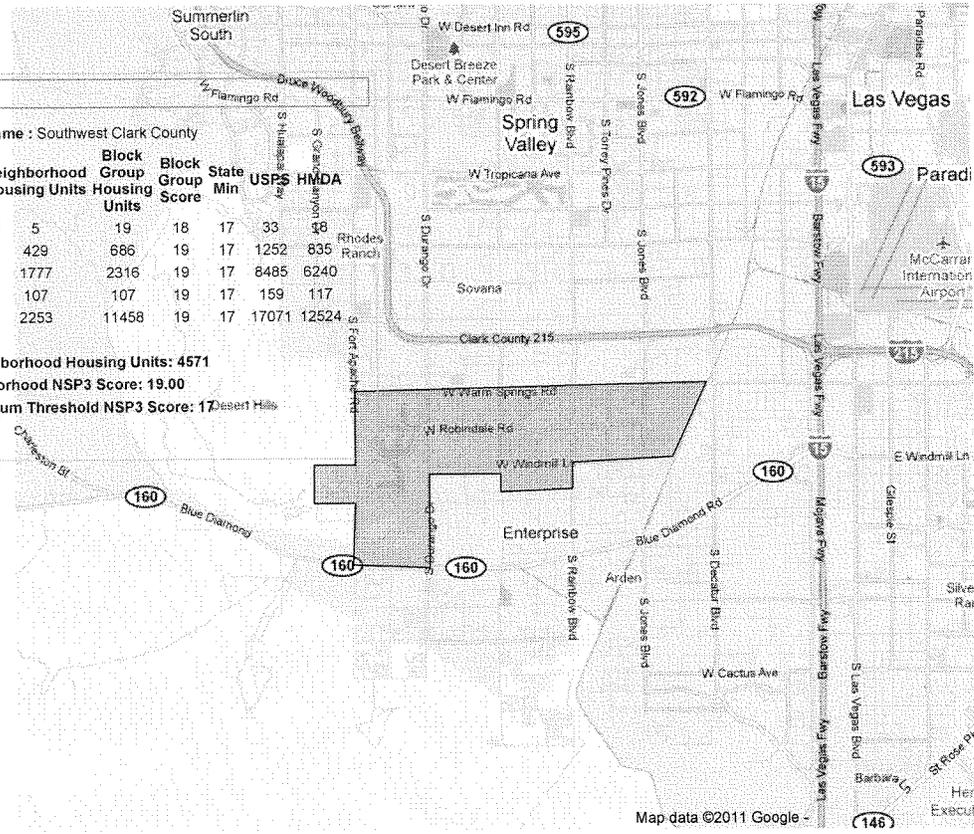
12 Current Zoom Level

Show Tracts Outline (Zoom 11+)

NSP3

Project Name : Southwest Clark County

Block Group



Block Group	Neighborhood Housing Units	Block Group Housing Units	Block Group Score	State Min	USPS	HMDA
3200394416228770005816R1	5	19	18	17	33	38
320039450423770002960R1	429	686	19	17	1252	835
320039450423770002960R1	1777	2316	19	17	8485	6240
320039450423770005821R1	107	107	19	17	159	117
320039450468585005821R1	2253	11458	19	17	17071	12524

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

Map data ©2011 Google

Neighborhood ID: 6897460

NSP3 Planning Data

Grantee ID: 3200300C

Grantee State: NV

Grantee Name: CLARK COUNTY

Grantee Address: 500 S. Grand Central parkway Las Vegas NV 89106

Grantee Email: lyndee@co.clark.nv.us

Neighborhood Name: Southwest Clark County

Date:2011-02-01 00:00:00

NSP3 Score

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

Neighborhood NSP3 Score: 19

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 4571

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 39.82

Percent Persons Less than 80% AMI: 24.02

Neighborhood Attributes (Estimates)

Vacancy Estimate

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

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

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

USPS Residential Addresses in Neighborhood: 10818

Residential Addresses Vacant 90 or more days (USPS, March 2010): 525

Residential Addresses NoStat (USPS, March 2010): 676

Foreclosure Estimates

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

Total Housing Units to receive a mortgage between 2004 and 2007: 7894

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 17.88

Percent of Housing Units 90 or more days delinquent or in foreclosure: 16.82

Number of Foreclosure Starts in past year: 871

Number of Housing Units Real Estate Owned July 2009 to June 2010: 477

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

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 174

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -50.7

Place (if place over 20,000) or county unemployment rate June 2005^{*}: 4

Place (if place over 20,000) or county unemployment rate June 2010^{*}: 14.1

^{*}Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

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

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4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-115.297565 36.055622 -115.297308 36.040979 -115.307865 36.041049 -115.307865 36.033275
-115.297565 36.033345 -115.297909 36.020711 -115.279026 36.020364 -115.278769 36.039105
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-115.217915 36.042298 -115.209503 36.057426

Blocks Comprising Target Neighborhood

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320030058211043, 320030058211042,



Neighborhood Stabilization Program Grants

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

Enter an Address, city or state Go

Select a State Select a County Go

Map Options : Clear | Reset

Click Mode: Zoom | Info

NSP3 Legend (%): ■ Tract Outline

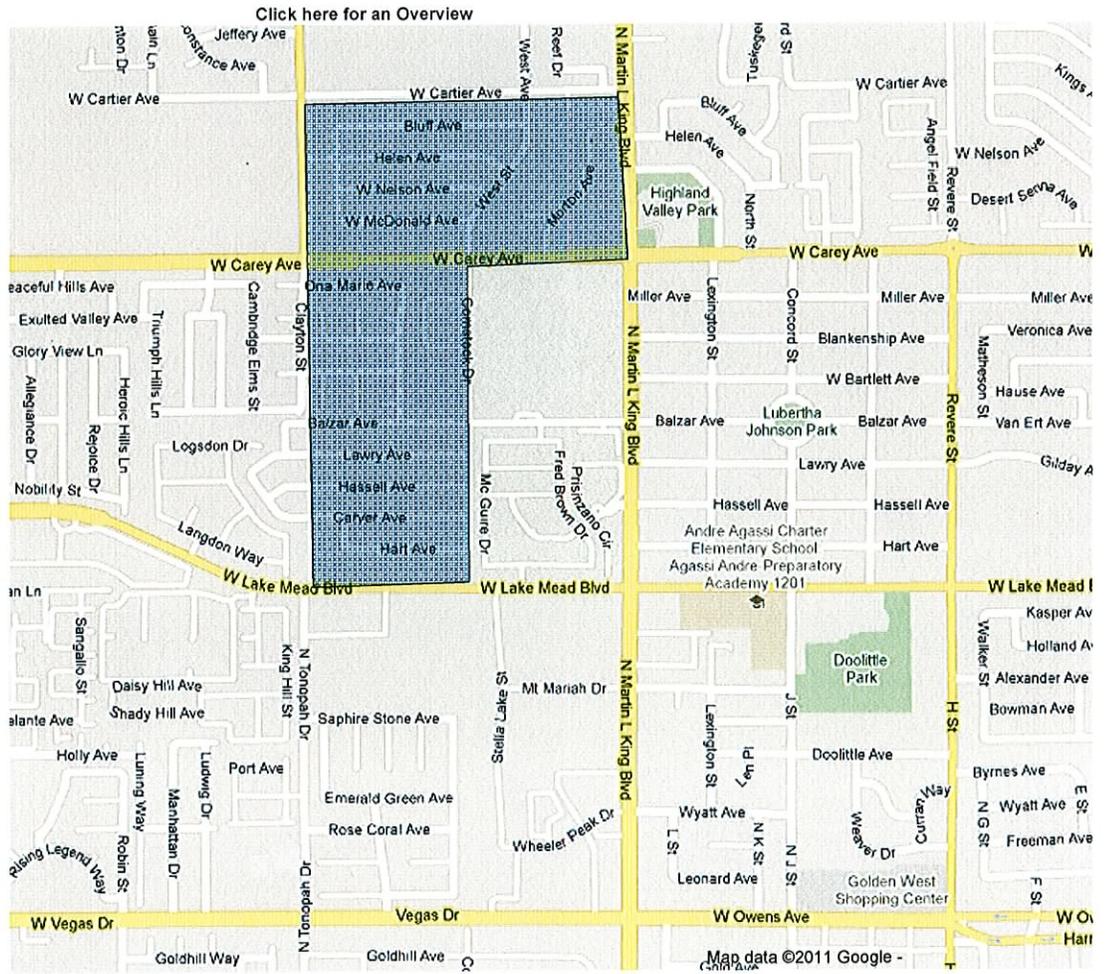
LOG OUT

NSP3 Options

15 Current Zoom Level

Show Tracts Outline (Zoom 11+)

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



Neighborhood ID: 6240753

NSP3 Planning Data

Grantee ID: 3251800P

Grantee State: NV

Grantee Name: NORTH LAS VEGAS CITY

Grantee Address: 2225 Civic Center Drive Suite 220 North Las Vegas NV 89030

Grantee Email: poseyb@cityofnorthlasvegas.com

Neighborhood Name: BVS Area

Date:2011-02-01 00:00:00

NSP3 Score

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

Neighborhood NSP3 Score: 20

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 1094

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 86

Percent Persons Less than 80% AMI: 65.8

Neighborhood Attributes (Estimates)

Vacancy Estimate

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

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

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

USPS Residential Addresses in Neighborhood: 1166

Residential Addresses Vacant 90 or more days (USPS, March 2010): 61

Residential Addresses NoStat (USPS, March 2010): 98

Foreclosure Estimates

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

Total Housing Units to receive a mortgage between 2004 and 2007: 869

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 41.1

Percent of Housing Units 90 or more days delinquent or in foreclosure: 27.2

Number of Foreclosure Starts in past year: 157

Number of Housing Units Real Estate Owned July 2009 to June 2010: 86

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

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 32

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -50.7

Place (if place over 20,000) or county unemployment rate June 2005*: 4

Place (if place over 20,000) or county unemployment rate June 2010*: 15.6

*Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

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

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

Latitude and Longitude of corner points

-115.161095 36.206503 -115.169764 36.206365 -115.169549 36.195733 -115.165257 36.195837

-115.165300 36.202798 -115.160837 36.202936

Blocks Comprising Target Neighborhood

320030036021010, 320030036021009, 320030036021025, 320030036021024, 320030036021022,
320030036021021, 320030036021020, 320030036021019, 320030036021029, 320030036021028,
320030036021027, 320030036021026,

EXHIBIT C:

Photos to document the current blighted
condition of Buena Vista Springs







EXHIBIT D:

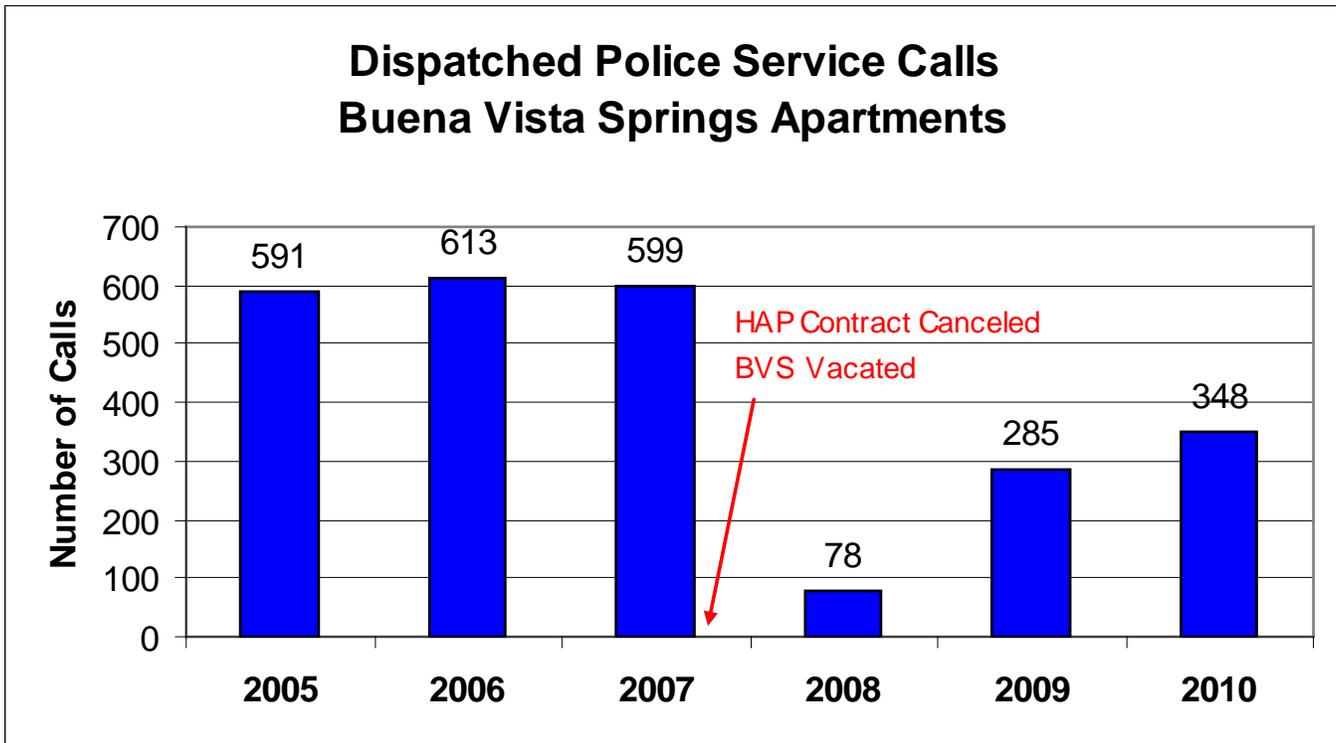


Exhibit E:
CLARK COUNTY AND NORTH LAS VEGAS NSP3 BUDGET (All Activities)

	Clark County Allocation	North Las Vegas Allocation	Total Federal Allocation	% of Federal Allocation	State of Nevada Allocation	TOTAL NSP3 FUNDS
NSP3 Federal and State Allocation of Funds	\$16,156,114	\$4,097,147	\$20,253,261		\$500,000	\$20,753,261
Acquisition and Rehabilitation for Rental (LH Set aside)						
Single Family - SNRHA Winchester (35 Single Family Homes) 30-50% AMI - NSP Rehab Standards	\$5,250,000	\$0	\$5,250,000	25.92%	\$0	\$5,250,000
Acquisition and Rehabilitation for Resale						
Single Family - SNRHA Winchester (25 Single Family Homes) Up to 120% AMI - NSP Rehab Standards	\$4,000,000	\$0	\$4,000,000	19.75%	\$0	\$4,000,000
Homebuyer Assistance Program DPA						
HUD-certified housing counseling agencies Southwest (175 SFH) Up to 120% AMI - No rehab	\$2,625,000	\$0	\$2,625,000	12.96%	\$0	\$2,625,000
Buena Vista Springs - Land Bank						
Acquisition - 288 housing units			\$2,200,000	10.86%		
Relocation - 40 households			\$2,401,735	11.86%		
Demolition - 288 housing units			\$2,126,000	10.50%		
Holding/Maintenance through NSP3 expenditure deadline			\$125,000	0.62%		
TOTAL	\$2,665,503	\$3,687,432	\$6,352,935	31.37%	\$500,000	\$6,852,935
Administration (10% cap)						
General management, oversight, and professional services	\$1,615,611	\$409,715	\$2,025,326	10.00%	\$0	\$2,025,326
TOTAL	\$16,156,114	\$4,097,147	\$20,253,261	100.00%	\$500,000	\$20,753,261

EXHIBIT F:

SUMMARY OF PUBLIC COMMENTS and RESPONSES

NSP3 Proposed Substantial Amendment

Public Comment Period February 4 – 21, 2011

The following is a summary of public comments received regarding the NSP3 proposed Substantial Amendment and responses. A public hearing was conducted on February 15, 2011. One written letter for comment was received on February 18, 2011. Comments received in letters are summarized in this section and the letter attached for reference. One email written comment was received on February 21, 2011. Comments received via email are included in total as received without edit to content.

PUBLIC HEARING

On February 15, 2011, Clark County conducted a public hearing at the Board of County Commissioners regularly scheduled meeting time and location. At this public hearing, one citizen inquired if any of the NSP funds awarded to date had been returned to HUD to which staff responded no. Clark County successfully met HUD's deadline to obligate 100% of NSP1 funds within 18 months of the grant award. There were no additional comments or questions from the public at the public hearing. Following the close of the public hearing, the Board of County Commissioners approved the NSP3 Amendment and authorized staff to submit to HUD.

LETTER from Jacque Haas Woodring, Real Estate Development Manager, Nevada H.A.N.D. Inc.

Nevada H.A.N.D. supports the overall NSP3 plan and believes that the funds allocated to the acquisition, rehabilitation and resale of 25 single family homes (Activity 2) should be awarded to a single developer through a request for proposal process solicited by Clark County. The selection of one developer will provide economies of scale including less administrative burden, tighter controls, better pricing, and increased program income.

Response:

Clark County will issue a Request for Proposal/Request for Qualifications to solicit applications from nonprofit Developers interested in the Acquisition Rehab Resale program following HUD's approval of the NSP3 Substantial Amendment. Through this process, organizations will have the opportunity to submit proposals and staff will evaluate proposed activities as well as the financial and organizational capacity of all applicants prior to making recommendations to the Board of County Commissioners. Policies and procedures will be identified in the grant agreement in order to ensure cost reasonableness of all NSP3 funds expended for rehabilitation. All properties will be required to meet local building codes as well as NSP Rehab Standards prior to resale and occupancy.

EMAIL from Kathy Cormack, Green Las Vegas Now Organization

I am forwarding this bit of correspondence because I would like you to know that GreenLqsVegasNow.org's. three years of gruesome initiation has given us a whole lot of insight

into how to make a difference to this great county of Clark. I have stated over and over to anyone that would listen that it was not the County , or HUD that is and has been the problem. It has been the Banks that refused to follow the rules. This last year 2010, has been fighting and losing court battles with the local so called investors, (flip and flop it guys) who are still hiring illegal's, doing the cheapest work possible and not much of that. This neighborhood has become a haven for these mobsters, who make the old mob seem angelic. Our court system simply does not have the time to hear anything at all, and it is accepted that it is now just a processing center for paper dealers for the banks. I was so politely told and informed that "due process" is a thing of the past. Let it be known that I truly love this county and all of you. GreenLasVegasNow was modeled after Kristen Cooper's submission to HUD because it was perfect . I personally sent many of my friends to the Consumer Credit Counseling class taught by Jodi Mobley. There is not a more excellent class on the subject of home buying in this environment anywhere. I knew in my heart that even though there would probably never be any follow through for these potential homebuyers, they would be informed and never be taken advantage of. Because I have demanded that we be a model organization and never take a dime that we were not sure of , we were never able to take a penny. We found four potential partnerships that were all interested in ripping off this program for all they could get. One man stood out and has worked with integrity , honesty and has held out this small modicum of hope. That man is Donald Demars and his Balance 2030 Program. We had to stop listening to everyone but him. We know that his heart and soul is in this project to restore Paradise Palms as a model community.

We have a plan. We have a path! We have a solution. It is entirely based on the county and HUDs solution. We have no money and have been through a mini war with real estate developers that would love to destroy me and our Dream. Why? Because they are making a killing on this neighborhood without following any of the rules. They are renting out these houses with mold, old wiring , poor insulation, caved in ceilings, at yesterday's prices. They do not want me in their way to point out that this is unconscionable. Every day for over three years I visit a new foreclosure. I am forced to live in what I call Talbot Camp. On this street that cost me a fortune that I do not have , there are bonfires set up from my neighbors. twice a week. We are the only neighborhood in 89169 with some modicum of trees and grass. The abandoned feral cat situation is atrocious. I personally have had to abandon all of my efforts to help and take these sweet adorable creatures to "Heaven Can Wait , getting them shots and spayed and neutered , and adopted out on my own. The so called Real Estate Moguls here have found a better illegal way to handle this problem . They simply poison them. They are happy and laugh out loud saying and telling anyone that inquires that I am crazy and not to talk to me or else. ! Our only hope to survive is Donald Demars. Our only hope is this program that we wanted to create an honest decent neighborhood to live in and enjoy. If there were some way that we could present our plan to Shawn Donovan and Create a NSP "Direct Pay

Letter of Credit for Non Profits" then the only money we would have to use would be in case of a default. There would be no chance for abuse, and we could work with all of the Non Profits together in corroborations the way it should and intended to be. Bringing these Real Estate Developers such as Mission House and REDC is a huge mistake in my opinion. The reason is that,(I have discovered the hard way) that one cannot turn Profit Making Corporations and Profit making thinkers into non_profit thinkers. They cannot and never will see eye to eye. While I must admit they put on a good show when REDC did that NSP carnival at Cashman field, we all know that it was just that , a show. It was also the only solution and a brilliant one at the time. That is because they have the resources and the money and the ability to do that when it was needed. However if they are allowed to continue , then I am afraid that they will do the same thing that has happened to me and my organization personally. Thy will Rob you Blind when you least expect it. Please, I must emphasize this fact. Their interest is always about control and money and not the best interest of the communities that they do not live in. This is why HUD program was created , and tries to make sure that the Communities are Stabilized. If you bother to read this I will be filled with gratitude. I do understand and know everyone 's frustration in trying to work so hard and do the right thing for this county . Again I truly admire and have the deepest respect for all of you. I really do know and understand the frustration that you must also feel for what is happening to this great and wonderful County and Country that we love . This was and is supposed to be a recomendation for the county. Well , I am asking to be given that chancce once again. If that does exist , then I would have you call Mr Donald Demars. I am devoted to his kind , compassionate and professional ideas of how " to stay the course " to Save the Course. He alone, along with us ,refused to tolerate taking dirty money or special interest monies in order to fullfill this dream. The Dream? To GREENLASVEGASNOW in every way we can. To create an honest world and community to live in that takes time to care !

Response:

Following HUD's approval of the Substantial Amendment, Clark County will issue a Request for Proposal/Request for Qualifications to solicit applications from nonprofit organizations interested in participating in NSP3 activities. Through this process, organizations will have the opportunity to submit proposals and staff will evaluate proposed activities as well as the financial and organizational capacity of all applicants prior to making recommendations to the Board of County Commissioners. Clark County is aware that consumers face significant competition from investors. Building upon and learning from our experiences in NSP1, Clark County will continue to evaluate and pursue opportunities as well as strategic partnerships that will aid in the successful implementation of NSP3.



Nevada H.A.N.D., Inc.

Housing And Neighborhood Development

February 17, 2011

Lyndee Cichon
Clark County
Community Resources Management
500 Grand Central Parkway, Box 551212
Las Vegas, NV 89155-1212

Re: Neighborhood Stabilization Program 3 (NSP 3) – Public Comment

Dear Lyndee:

This correspondence outlines our comments to the Clark County and North Las Vegas Substantial Amendment to the FY 2010 Action Plan for Housing and Community Development's Neighborhood Stabilization Program 3.

Nevada H.A.N.D., Inc. supports the overall NSP 3 plan. As one of the active developers selected to facilitate the acquisition, rehabilitation management and resale of NSP 1, we have acquired 33 single family homes, resold 6 of those homes, currently have 7 homes in escrow, and 13 homes are presently under rehabilitation through NSP 1.

We offer the following comments with respect to "Activity Number 2" in the current proposed plan, which is the Acquisition Rehab for Resale of Single Family Homes in Clark County. Specifically, the plan proposes the acquisition, rehabilitation, and resale of 25 foreclosed single family homes.

We believe that the acquisition, rehabilitation, and resale of all 25 foreclosed single family homes be awarded to one developer through a request for proposal (RFP) process solicited by Clark County.

By selecting one developer to undertake this activity, economies of scale may be achieved through the following ways:

- Less administrative burden for Clark County staff in that the County will only need to have one single point of contact
- More control of the homes that are actually acquired
- Tighter controls over the rehab process with greater certainty that homes are being brought up to current code and required energy standards
- Energy Auditors and well as third-party general contractors will obtain better pricing as they will be awarded more homes through a single developer

Economies of scale will also help Clark County receive more program income from the resale, thus increasing the amount of homes affected in the Winchester community, which will create a deeper more meaningful impact.

Further, we believe that one of the pre-requisites to responding to a RFP is that the developer needed to demonstrate success with their participation in NSP 1. We remain extremely interested in continuing our partnership with Clark County in not only NSP 1, but also in providing a proposal to participate in "Activity Number Two" of NSP 3.

Please feel free to call me at (702) 410-2706 if you have any questions, or would like to further discuss. Thank you.

Sincerely,


Jacquie Haas Woodring
Real Estate Development Manager