

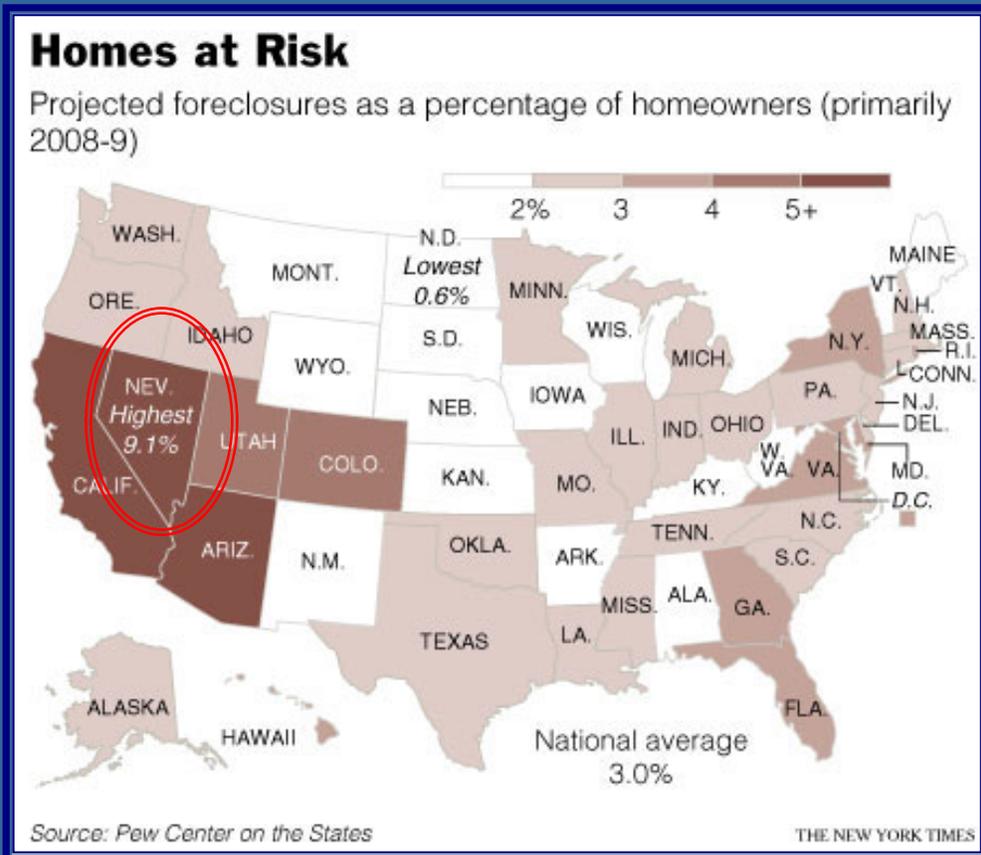


CLARK COUNTY, NEVADA

Neighborhood Stabilization Program

Re-Submission to HUD for Clark County and North Las Vegas

Feb. 5, 2009



BOARD OF COUNTY COMMISSIONERS

- Rory Reid, Chair Susan Brager, Vice-Chair
- Lawrence L. Brown, III Tom Collins
- Chris Giunchigliani Steve Sisolak
- Lawrence Weekly

Virginia Valentine, County Manager

THE NSP SUBSTANTIAL AMENDMENT

SECTION A: CLARK COUNTY

Jurisdiction(s): Clark County (lead agency) and North Las Vegas, Nevada Jurisdiction Web Address: http://www.accessclarkcounty.com/depts/Finance/crm/Pages/CommunityResourcesManagementDivision.aspx	NSP Contact Person: Kristin R. Cooper 500 S. Grand Central Pkwy, 5 th floor, Las Vegas, NV 89106 Telephone: 702-455-5025 Fax: 702-455-5038 Email: krc@co.clark.nv.us
---	--

Clark County proposes to amend the 2008 Action Plan and Consolidated Plan to fulfill the application requirements to receive Neighborhood Stabilization Program (NSP) funds through the U.S. Department of Housing and Urban Development (HUD), authorized under Title III of the Housing and Economic Recovery Act of 2008 (HERA). This law provides under a rule of construction that, unless HERA states otherwise, the grants are to be considered Community Development Block Grant (CDBG) funds. As a the lead agency for the Urban County CDBG Consortium 2006-2008, Clark County will submit this Substantial Amendment on behalf of Clark County and the City of North Las Vegas. Each jurisdiction has described its NSP activities in separate sections of this Amendment. In general, these NSP funds may be used for the acquisition and/or redevelopment of foreclosed and abandoned properties.

Figure 1 outlines the funding allocation received from the federal government and funding awarded to Clark County from the State of Nevada’s NSP allocation. Clark County, in conjunction with its partnering jurisdictions, has decided that the State NSP funds should be distributed based on the NSP formula used by HUD to allocate funds in Nevada.

FIGURE 1: FEDERAL & STATE NSP ALLOCATION BY JURISDICTION

Jurisdiction	NSP Allocation
Clark County	\$22,829,062
North Las Vegas	\$6,837,736
Total Federal Allocation	\$29,666,798
Clark County	\$8,056,784
North Las Vegas	\$1,814,256
Total State Allocation	\$9,871,040
Grand Total	\$39,537,838

FIGURE 2: FEDERAL & STATE NSP FUNDS FOR VERY LOW-INCOME BENEFICIARIES

Jurisdiction	50% AMI Allocation
Clark County	\$5,781,266
North Las Vegas	\$1,709,434
Total Federal Allocation	\$7,490,700
Clark County	\$2,309,727
North Las Vegas	\$690,273
Total State Allocation	\$3,000,000
Grand Total	\$10,490,700

Figure 2 describes the portion of the total allocation that is required to assist households at 50% of area median income (AMI) and below. The jurisdictions in Southern Nevada will be required to spend more than 25% of their State NSP funds for households at 50% AMI as required by the State. Clark County is also allocating slightly more than 25% for very low-income beneficiaries.

Figure 3 outlines the proposed activities to be undertaken by Clark County using NSP funding.

FIGURE 3: PROPOSED PROGRAMS FOR ELIGIBLE TARGETED COMMUNITIES

Program Name	Summary Description	Income Targeting	Geographical Targeting	Proposed Amount ¹
NSP Homebuyer Assistance Program (NSP-1)	Assists eligible homebuyers to purchase foreclosed or abandoned homes	Primarily households at 80-120% AMI	Eligible Targeted Communities	\$6,800,000
NSP Purchase and Rehabilitation of Single-Family Housing (NSP-2)	Assists designated non-profits to purchase and rehabilitate foreclosed or abandoned properties for resale to eligible households	Primarily households at 80-120% AMI	Eligible Targeted Communities	\$9,257,454
NSP Housing Counseling (NSP-3)	Assists designated non-profits to provide Housing Counseling to NSP participants	Households up to 120% AMI	Countywide	\$400,000
NSP Acquisition and Rehabilitation for Rental Housing (NSP-4)	Assist HACC or Non-Profits to purchase and/or rehab foreclosed or abandoned properties for rental	Households up to 50% AMI	Eligible Targeted Communities	\$11,090,993
Demolition (NSP-5)	Demolition of blighted structures	LMMI Area	Eligible Targeted Communities	\$75,000
Redevelopment (NSP-6)	Construct new homes or public facilities on demolished sites	LMMI Area	Eligible Targeted Communities	\$420,000
Total Program Funding				\$28,043,447
¹ Approximately \$2,282,906 in Federal NSP and \$559,493 in State NSP will be set aside for administrative purposes.				

Clark County and the City of Las Vegas will each receive \$2 million in NSP funding for Pilot Projects to be undertaken in conjunction with the State Housing Division. Clark County may enter into inter-governmental or subrecipient agreements with other entitlements receiving NSP funds if areas of greatest need encompass more than one jurisdiction and would benefit from the combined effort.

AREAS OF GREATEST NEED

(SEE SECTION B FOR INFORMATION ON NORTH LAS VEGAS)

Clark County is suffering from a significant number of foreclosures, short sales and pre-foreclosures, particularly in the Las Vegas Valley. In all, over 12,000 foreclosures have been identified in Clark County, including all of its incorporated and unincorporated areas (Map 1) using data from Applied Analysis, Inc.

According to the Foreclosure Response Project and analysis by the Local Initiative Support Corporation (LISC), unincorporated Clark County has an estimated 31,666 subprime loans, which is almost 19% of all loans. Over 90% of these loans were made in CDBG eligible areas. Another estimated 16,286 loans are 30 or more days delinquent (9.7% of all loans).

Areas With Greatest Percentage of Home Foreclosures

Map 2 provides a picture of the foreclosure rates by census tract. Figure 4 indicates the top 20 census tracts with the highest foreclosure rates. Both the map and the table show the alarming number of foreclosures, particularly in the more mature areas of the valley.

**FIGURE 4: UNINCORPORATED CLARK COUNTY
TOP 20 FORECLOSURE RATES BY CENSUS TRACT**

Rank	Census Tract	Foreclosure Rate	Rank	Census Tract	Foreclosure Rate
1	24.05	15.4	11	49.21	13.2
2	47.03	14.7	12	62.01	13.0
3	15.00	14.3	13	47.11	13.0
4	47.16	14.2	14	16.09	12.9
5	47.13	14.2	15	28.22	12.8
6	47.08	13.9	16	49.12	12.7
7	47.09	13.6	17	61.02	12.7
8	47.14	13.3	18	16.08	12.6
9	16.13	13.2	19	17.15	12.6
10	47.17	13.2	20	18.04	12.6

Areas with Highest Percentage of Homes Financed by a Subprime Mortgage

Current and accurate subprime lending data is not available. The data provided by HUD for the NSP application, identifying the foreclosure and abandonment risk scores, is the best available. To determine the census tracts with the highest percentage of homes financed by a subprime mortgage the “percentage of high cost loans” data was used. Map 3 identifies, by census tract, the most predominant neighborhoods where homes were financed by a subprime/high cost loan.

Areas Likely to Face a Significant Rise in Rate of Home Foreclosure

Again, current and accurate data showing areas most likely to face a significant rise in foreclosure is not available; therefore the “Estimated foreclosure abandonment risk score” provided by HUD was used to identify areas that are at high risk for future foreclosures and abandonment. Map 4, where 0 indicates a very low risk and 10 suggest a very high risk for future foreclosures and abandoned properties, highlights the valley-wide nature of the crisis.

OTHER FACTORS CONSIDERED TO DETERMINE AREAS OF GREATEST NEED

Low/Moderate/Middle Income (LMMI) Areas

Using the HUD data, Map 5 identifies the census tracts/block groups that qualify as LMMI eligible areas. However, the data used to identify LMMI areas is from the 2000 Census and is somewhat out of date due to the high growth that has occurred in Clark County since 2000. For example, the major part of census tract 58.16 in the Enterprise Township area is identified as eligible; however this has been a high growth area in the Unincorporated County with higher cost housing built there since 2000. Therefore, it is unlikely that census tract 58.16 is, in fact, LMMI eligible. It is also important to note that several of the areas that are LMMI eligible are county islands located within the City of Las Vegas.

DISTRIBUTION AND USES OF FUNDS

Using all of the data presented thus far, Clark County has determined that certain zip codes and census tracts have the greatest need for the Neighborhood Stabilization Program. The list below includes the targeted zip codes/targeted census tracts. The County will focus its efforts in these areas. While the entire Las Vegas Valley is suffering from extremely high foreclosure rates, these particular zip codes were chosen because the majority of the census tracts they encompass have a foreclosure rate over 9%, are LMMI eligible, have a subprime loans rate over 25% and have a prediction score of future foreclosures and abandonment of 8 or above (see Exhibit 2 and Map 6). Please note that there are two census tracts that would have been eligible but were not included in this list because the number of foreclosures was under 2.

TARGETED AREAS:

- | | |
|-----------------------------------|---|
| ✓ 89103 | ✓ 89156 |
| ✓ 89110 (<i>County Portion</i>) | ✓ 89169 |
| ✓ 89115 | ✓ 89102 (<i>CT 22.05 only</i>) |
| ✓ 89119 | ✓ 89104 (<i>CT 15.00, 16.09, 16.10, 16.11 only</i>) |
| ✓ 89121 | ✓ 89120 (<i>CT 28.22 & 28.23 only</i>) |
| ✓ 89122 | ✓ 89147 (<i>CT 29.19 & 29.41 only</i>) |
| ✓ 89142 | |

Clark County is concerned that the NSP 15% discount requirement will have a negative impact on neighborhoods by driving down property values if too many foreclosed properties in one specific neighborhood are targeted. Therefore assistance will be widely dispersed within the identified areas of greatest need, unless specific strategies can be identified that clearly demonstrate that concentrating efforts will not negatively impact property values.

DEFINITIONS AND DESCRIPTIONS

“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.

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:

- ✓ 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” 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.

“Continued 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 exceed the HOME program requirements as the NSP program evolves.

“Housing Rehabilitation Standards” require that all buildings assisted with NSP funds be brought up to local code, that required building permits be obtained and that appropriate inspections be performed.

LOW INCOME TARGETING

Clark County will use \$5,781,266 in Federal NSP funds and \$2,309,727 in State NSP funds for individuals or families whose incomes do not exceed 50% AMI.

ACQUISITIONS & RELOCATION

Clark County may demolish up to 3 housing units for redevelopment in a target area. Either a new structure would be constructed on these sites or they may be converted to

some other public use. The County intends to purchase properties that are unoccupied; however, should a property be occupied the county will follow the Uniform Relocation Act to relocate any legal residents.

OTHER RESOURCES

Clark County has spent and continues to spend a significant amount of public funding to improve the quality of life in the target areas through the construction of public facilities and affordable housing (See Map 7). The projects indicated on the map are those that were or are being funded using federal and state grants/mortgages and does not include a large investment of public funds into public works projects completed and planned including flood control, roads, sewer, sidewalks, trails, street lighting and public facilities. Clark County will continue to fund public works, public facilities and affordable housing development in the target neighborhoods.

Additionally, homeownership has been encouraged in the target areas through State Housing Division's mortgage revenue bond program, which has been awarded over \$93 million in Clark County Private Activity Bonds since 2005. Clark County also focused its Housing Rehabilitation Program, which was in operation from 2003 to 2006, on improving the housing in the target area of Whitney. In all, over \$30 million in CDBG has been invested in the target areas over the last five years.

PUBLIC COMMENT

A Public Notice soliciting comments on the Proposed Amendment to FY 2008 Annual Action Plan and FY 2005-2009 Consolidated Plan Neighborhood Stabilization Program (NSP) was published in the Las Vegas Review-Journal on November 9, 2008 and posted to Clark County's official website on November 10, 2008. The notice was for a 15-day public comment period beginning November 9, 2008 and ending at 4 pm on November 23, 2008. The final amendment as submitted to HUD was posted to the County's official website on December 1, 2008. A copy of the Public Notice and public comments for Clark County and North Las Vegas are attached at the end of this document. The 15-day public comment period prior to resubmission of the Proposed Amendment was noticed in the Las Vegas Review-Journal on January 16, 2009 and ended at 4 pm on January 30, 2009. No comments were received on the revised NSP Amendment.

NSP INFORMATION BY ACTIVITY

Clark County proposes to use the NSP funds as described in the following Activity descriptions. However, the County reserves the right to shift funding from one activity to another and from one agency to another as additional areas of greatest needs are identified, and according to availability of suitable properties, agency capacity, project readiness, and ability to meet the timeliness requirements of NSP. Such shifting of funds from one activity to another shall not be considered a substantial amendment to the Action Plan. Notwithstanding the foregoing, under all circumstances a minimum of 25% of NSP funds will be used for housing individuals and families whose incomes do not exceed 50% of AMI. The budget for all Clark County activities is found in Exhibit 1.

ACTIVITY 1

(1) Activity Name: **NSP Homebuyer Assistance Program (HAP)**

(2) Activity Type:

NSP Eligible Use: Establish financing mechanisms (HERA 2301(c)(3)(A))

Eligible Activity: Direct homeownership assistance (24CFR 270.201(n))

(3) National Objective:

24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% AMI permitted under NSP)

(4) Projected Start Date: **March 2009**

(5) Projected End Date: **September 2010 – activity will continue with any program income.**

(6) Responsible Organization:

**Clark County Community Resources Management Division
500 S. Grand Central Parkway, PO Box 551212
Las Vegas, NV 89155-1212
702-455-5025
Michael J. Pawlak, Manager**

Using an RFQ or RFP process, non-profits will be identified to undertake the Homeownership Assistance programs.

(7) Location Description: **Eligible Census Tracts (see list under “Distribution and Uses of Funds”)**

(8) Activity Description:

The purpose of the program is to enable low-and middle-income households to quickly purchase and occupy foreclosed single-family homes before the effects of vacancy, vandalism and blight become acute. Through the provision of a broad range of financial assistance and incentives, new homebuyers will purchase and occupy foreclosed properties that meet the County's housing standards in designated census tracts. The target purchaser population would be FHA or other credit worthy borrowers. This program will also be used to assist homebuyers to purchase homes that have been acquired and rehabilitated through the County's Purchase and Rehabilitation of Single Family Housing activity (see Activity 2). All properties acquired under this activity must meet the required purchase discount of 5% less than current market appraised value, and must be as high as required to keep the total NSP portfolio within the required purchase discount level of 15%. The discounted price shall be supported by an appraisal meeting the requirements of the Notice.

This program will be operated through designated participating non-profits using pre-approved lenders offering FHA or conventional fixed rate mortgages. Homebuyer Assistance loans of up to \$25,000 in direct NSP assistance will be available for the following types of activities:

- ✓ downpayment assistance,
- ✓ closing costs,
- ✓ interest rate buy down,
- ✓ principal reduction

These activities will serve eligible 120% AMI or below households to assist them in becoming homeowners.

All homebuyers will be required to:

- Have a total gross income at or below the 120% of the area's median income, adjusted for family size.
- Total household assets of no more than \$30,000
- Occupy the home as a principal residence
- Qualify for a first mortgage through a pre-approved lender using FHA or conventional fixed rate mortgage financing
- Complete a County approved, eight hour homebuyer training program
- Accept specific deed restrictions, including repayment of the loan upon sale, transfer of title, refinancing of the first mortgage, or leasing of the property.

Homebuyer Assistance will be in the form of a conditional second mortgage loan secured by a deed of trust. The maximum amount is anticipated to not exceed \$25,000; however, this determination will be made based on market conditions at the time of program implementation. NSP funds will be recaptured upon sale, transfer or change of ownership of the assisted property. Specific loan requirements may vary depending on the type of first mortgage financing available in the marketplace for low- and

middle-income households. NSP assisted properties will be required to meet the “continued affordability” requirements established by the County for the NSP Program. The minimum requirements will be in accordance with the HOME Program standards at 24 CFR 92.254 for homeownership housing. We may also consider the type and availability of NSP programs in neighboring jurisdictions in an effort to coordinate program delivery and avoid consumer confusion.

Using down payment assistance will allow the County to leverage NSP funds with first-mortgage monies to initially assist approximately 270 households. As program income is received from this program it may be used to make additional loans through this activity.

(9) Total Budget: :

\$6,800,000 of NSP funds for HAP. It is estimated that the average discounted cost for these properties will be \$185,000.

(10) Performance Measures

Homeownership assistance will help to stabilize property values in our target neighborhoods by assisting families to purchase and occupy vacant properties. This new investment of public funds into the target areas should stimulate private investment as other families purchase and/or rehabilitate homes in the area. These purchases will be undertaken using traditional 30-year, fixed rate loan products, thereby stopping the cycle of foreclosures that have resulted from exotic loan products. The influx of new families into the target areas will help to maintain local retail services that are struggling in the current economy. 270 households with income at 120% AMI or lower will be assisted with homeownership assistance to purchase foreclosed homes.

ACTIVITY 2

(1) **Activity Name: NSP Purchase and Rehabilitation of Single-Family Housing
(Includes State Pilot Project)**

(2) **Activity Type:**

NSP Eligible Use: Purchase and rehabilitate homes and residential properties that have been abandoned/vacant or foreclosed upon, in order to sell, rent or redevelop such homes and properties. (HERA 2301C(3)(b))

Eligible Activity: Acquisition, disposition, possible relocation, direct homeownership assistance, eligible rehabilitation and preservation activities for homes and other residential properties and housing counseling for those seeking to take part in the activity. (24 CFR 570.201(a) and 570.202)

(3) **National Objective:**

24 CFR 570.208(c) Housing assisted with NSP funds will provide permanent housing to low-, moderate- and middle-income persons

(4) **Projected Start Date: March 2009**

(5) **Projected End Date: September 2010 – activity will continue with any program income.**

(6) **Responsible Organization:**

**Clark County Community Resources Management Division
500 S. Grand Central Parkway, PO Box 551212
Las Vegas, NV 89155-1212
702-455-5025
Michael J. Pawlak, Manager**

Clark County will administer the revolving loan fund and will select development partners through a competitive request for proposals process.

(7) **Location Description: Eligible Census Tracts (see list under “Distribution and Uses of Funds”)**

(8) **Activity Description:**

The purpose of the program is to acquire and rehabilitate foreclosed and abandoned homes in heavily impacted neighborhoods and resell them to program-eligible owner-occupants. Using NSP funds (and other lines of credit as available) non-profit organizations selected by the County through a competitive RFP/RFQ process would

purchase foreclosed or abandoned homes and rehabilitate them to County housing standards. Homes may be purchased individually or through a bulk sale. Upon completion of rehabilitation, homes would be marketed to eligible buyers. This activity will provide affordable homeownership opportunities for households earning less than 120% AMI while simultaneously repairing damaged property and modernizing older housing stock.

To implement this activity, the jurisdiction will provide funds for one or more developers to acquire and rehabilitate abandoned/vacant or foreclosed upon homes in eligible census tracts. All properties acquired under this activity must meet the required purchase discount of 5% less than current market appraised value, and must be as high as required to keep the total NSP portfolio within the required purchase discount level of 15%. The discounted price shall be supported by an appraisal meeting the requirements of the Notice.

Clark County will provide funds for the acquisition, rehabilitation and redevelopment of the homes to include related eligible development and activity delivery costs, sales and closing costs, and reasonable developers fees. The developer will then sell each home to an eligible buyer. It is anticipated that the new purchasers will be provided with homebuyer assistance in the form of downpayment assistance, closing costs, interest rate buy down, principal reduction or other financing mechanisms as described in Activity 1. NSP assisted properties will be required to meet the “continued affordability” requirements established by the County for the NSP Program. The minimum requirements will be in accordance with the HOME Program standards at 24 CFR 92.254 for homeownership housing.

As an alternative to sale, Clark County may authorize the home to be transferred to the rental program described in Activity 4. The continued affordability requirements of NSP assisted rental properties will be in accordance with the HOME Program standards at 24 CFR 92.252 (a), (c), (e) and (f).

Funds repaid by the developer from sale proceeds will be treated as program income according to the terms of the Notice and used to fund additional NSP activities.

(9) Total Budget: :

\$7,069,891 in Federal NSP funds, \$2,187,564 in State NSP funds (inclusive of \$2 million in State NSP Pilot Project funds) to purchase abandoned/vacant or foreclosed properties and provide rehabilitation. It is estimated that the average discounted cost for these properties will be \$185,000. This budget includes purchase of home, closing costs, rehab costs, carrying costs and project delivery costs directly attributable to a specific address.

(10) Performance Measures

Acquisition and rehabilitation for resale will help to stabilize property conditions and values in our target neighborhoods by rehabilitating and modernizing older housing stock and then assisting families to purchase and occupy vacant properties. Rehabilitation will incorporate energy efficiency and conservation measures that will reduce household utility costs thereby providing more disposable income to the new owners. This new investment into the target areas should encourage other families to purchase and/or rehabilitate homes in the area. These resale purchases will be undertaken using traditional 30-year, fixed rate loan products, thereby stopping the cycle of foreclosures that have resulted from exotic loan products. The influx of new families into the target areas will help to maintain local retail services that are struggling in the current economy and to help stabilize school enrollment. 50 households with income at 120% AMI or lower will be assisted to purchase or rent rehabilitated abandoned/vacant or foreclosed homes. An additional 200 households may be assisted as the program income is reused for this activity.

ACTIVITY 3

(1) Activity Name: **NSP Housing Counseling**

(2) Activity Type:

NSP Eligible Use: Housing Counseling (HERA 2301C(3)(A) & (B))

Eligible Activity: Limited Clientele (LMMI) (24 CFR 570.208(A)(2))

(3) National Objective:

24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% AMI permitted under NSP)

(4) Projected Start Date: **March 2009**

(5) Projected End Date: **July 2013**

(6) Responsible Organization:

**Clark County Community Resources Management Division
500 S. Grand Central Parkway, PO Box 551212
Las Vegas, NV 89155-1212
702-455-5025
Michael J. Pawlak, Manager**

Using a Request for Qualifications process, non-profits will be identified to participate in the housing counseling portion of the NSP.

(7) Location Description: **Clark County, Nevada**

(8) Activity Description:

Clark County will allocate these funds to qualified, HUD Certified Housing Counseling Agencies based upon a Request for Qualifications. In order to identify households at 120% AMI and below that will qualify for homeownership, on average it is necessary to provide homeownership counseling to approximately 10 people/households in order to identify 1 eligible homebuyer. The households receiving this housing counseling will include homeowners planning on participating in any of the NSP programs for homeownership. These households will receive at least eight hours of counseling.

(9) Total Budget: :

\$400,000 of Federal NSP funds.

(10) Performance Measures

Approximately 4,000 households will receive housing counseling in order to prepare them for homeownership using NSP funds. Helping families understand how to properly budget their income and teaching them the ins and outs of homeownership will make them more stable and responsible homeowners. Ultimately this should help to reduce the foreclosure rate and protect the homeowner's equity over time.

ACTIVITY 4

(1) Activity Name: **NSP Acquisition and Rehabilitation for Rental Housing**

(2) Activity Type:

NSP Eligible Use: Purchase, Rehab and Rent Foreclosed properties (HERA 2301(c)(3)(B))

**Eligible Activity: Acquisition (24CFR 270.201(a))
Eligible Rehabilitation and Preservation Activities (24 CFR 570.202)**

(3) National Objective:

24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% AMI permitted under NSP)

(4) Projected Start Date: **March 2009**

(5) Projected End Date: **September 2010 – activity will continue with any program income**

(6) Responsible Organization:

**Clark County Community Resources Management Division
500 S. Grand Central Parkway, PO Box 551212
Las Vegas, NV 89155-1212
702-455-5025
Michael J. Pawlak, Manager**

**Housing Authority of Clark County
5390 E. Flamingo Road
Las Vegas, NV 89122
702-451-8041
Howard Wasserman, Acting Executive Director**

(7) Location Description: **Eligible Census Tracts (see list under “Distribution and Uses of Funds”)**

(8) Activity Description:

The purpose of this program is to purchase and rehabilitate foreclosed or abandoned rental housing to primarily benefit households at or below 50% of area median income. The County would use NSP funds to assist the Housing Authority of Clark County (HACC) to strategically purchase and rehabilitate foreclosed or abandoned rental properties in eligible target communities to add to its existing portfolio of scattered site rental housing. The County also plans on assisting non-profit partners selected through

an RFP or RFQ process with acquisition and rehabilitation of permanent rental housing.

The County assistance would be in the form of a grant and/or subordinated mortgage. The County would, whenever practical, leverage these investments with other sources of financing. This would be the County's primary NSP program for benefiting households at or below 50% of area median income. Agreements and deed restrictions would be recorded to ensure long-term affordability (minimum per HOME Program requirements).

The purchase of these units will be strategically undertaken in cooperation with the County throughout the eligible census tracts to effectively support other NSP activities and to promote neighborhood stabilization. Subject to approval by the HACC's Board of Directors, the HACC is expected to be the County's primary partner for this activity. HACC and other selected nonprofits will own, operate, and manage these NSP properties. The tenure of the beneficiaries will be rental and individual leases must be for at least one year. As currently interpreted, NSP considers rental revenue in excess of the cost of operating and maintaining the unit to be program income and must be returned to the County.

All properties acquired under this activity must meet the required purchase discount of 5% less than current market appraised value, and must be as high as required to keep the total NSP portfolio within the required purchase discount level of 15%. As program income is received from other NSP activities, neighborhood stabilization through rental activity may be expanded as funds permit.

(9) Total Budget:

\$2,207,265 in Federal NSP funds and \$5,309,727 in State NSP for the HACC to purchase, rehab and rent foreclosed or abandoned properties. \$3,574,000 in Federal NSP for participating non-profits to purchase, rehab and rent foreclosed or abandoned properties. It is estimated that the average discounted cost for these properties will be \$160,000. This budget includes purchase of home, closing costs, minor rehab costs, carrying costs and project delivery costs directly attributable to a specific address.

(10) Performance Measures

Acquisition and rehabilitation for rental will help to stabilize property conditions and values in our target neighborhoods by rehabilitating the housing stock and renting those units to qualifying families. This new investment into the target areas should encourage other families to purchase and/or rehabilitate homes in the area. These formerly vacant properties will no longer be an enticement to vandals and thieves. The participating non-profit owner will maintain these units long-term. The influx of new families into the target areas will help to maintain local retail services that are struggling in the current economy. 69 units of housing to be acquired, rehabilitated (minor), and rented to households that are below 50% of median family income.

ACTIVITY 5

(1) Activity Name: **Demolition**

(2) Activity Type:

NSP Eligible Use: Demolition (HERA 2301(c)(3)(D))

Eligible Activity: Clearance for blighted structures only (24 CFR 570.201(d))

(3) National Objective:

24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% AMI permitted under NSP) and potentially under CFR 570.208(a)(1)

(4) Projected Start Date: **March 2009**

(5) Projected End Date: **July 2013**

(6) Responsible Organization:

**Clark County Community Resources Management Division
500 S. Grand Central Parkway, PO Box 551212
Las Vegas, NV 89155-1212
702-455-5025
Michael J. Pawlak, Manager**

(7) Location Description: **Eligible Census Tracts** (see list under “Distribution and Uses of Funds”)

(8) Activity Description:

The properties demolished with these funds will be blighted structures, some of which may be previously foreclosed upon homes. Activities under this part are intended to support and supplement other NSP neighborhood revitalization efforts by allowing the County to demolish individual properties that may be too distressed to make rehabilitation economically feasible. Any blighted properties to be demolished that have not been foreclosed upon will be purchased using non-NSP funds. Prior to approving any property for demolition, the County will identify the specific plan for re-use of the property, indicating whether it will be for residential housing or public facility/improvement, and will identify the source of funds to accomplish the plan. This activity is not intended as Land Banking. Any demolished properties purchased with NSP funds via another NSP activity will meet all of the required provisions of those sections as regards NSP minimum discount requirements and ongoing affordability. While these funds will not provide a direct benefit to households at or below 120% AMI, the blight removal may provide benefits to locations in which the income for the area is at or below 120% AMI.

(9) Total Budget: :

\$75,000 in Federal NSP funds.

(10) Performance Measures

Clark County has provided funding for the demolition of 3 housing units. These housing units are generally the target of vandals and bring property values down in the surrounding neighborhood. The removal of these units will help stabilize property values, possibly even increasing property values for those homes closest to the nuisance property.

ACTIVITY 6

(1) Activity Name: **Redevelopment**

(2) Activity Type:

NSP Eligible Use: Redevelopment (HERA 2301(c)(3)(E))

**Eligible Activity: Public Facilities (24CFR 570.201(c))
New Housing Construction (24CFR 570.201)**

(3) National Objective:

24 CFR 570.208(a) (1) Area Wide Benefit

(4) Projected Start Date: **March 2009**

(5) Projected End Date: **July 2013**

(6) Responsible Organization:

**Clark County Community Resources Management Division
500 S. Grand Central Parkway, PO Box 551212
Las Vegas, NV 89155-1212
702-455-5025
Michael J. Pawlak, Manager**

(7) Location Description: **Eligible Census Tracts (see list under “Distribution and Uses of Funds”)**

(8) Activity Description:

This activity will provide for the redevelopment of the 3 properties that were demolished under Activity 5 or as otherwise permissible under NSP. These sites may be redeveloped either as new construction of housing (for rental or homeownership as appropriate for area revitalization) or as public facilities/improvements. This activity is not intended as Land Banking. Activities under this part are intended to support and supplement other NSP neighborhood revitalization efforts by allowing the County to redevelop demolished properties that were not purchased with NSP funds but were demolished with NSP funds. Any properties redeveloped as residential housing with NSP funds will meet the continued affordability requirements established by the County for the NSP Program. The minimum requirements will be in accordance with the HOME Program standards at 24 CFR 92.254 for homeownership housing or, for rental housing, in accordance with the HOME Program standards at 24 CFR 92.252 (a), (c), (e) and (f).

(9) Total Budget: :

\$420,000 in Federal NSP funds for the redevelopment of three sites.

(10) Performance Measures

Redevelopment of three sites. These sites are generally the target of vandals and bring property values down in the surrounding neighborhood. The redevelopment of these sites with either new housing units or some other public facility will help stabilize property values, possibly even increasing property values for those homes closest to the redevelopment sites.

ACTIVITY 7

(1) Activity Name: **Administration**

(2) Activity Type:

NSP Eligible Use: Administration and Planning Costs (HERA 2301(c)(3))

Eligible Activity: Administration and Planning Costs (24CFR 270.205 and 24 CFR 270.206)

(3) National Objective: **Not applicable**

(4) Projected Start Date: **October 2008 - reimbursement for pre-award costs allowed**

(5) Projected End Date: **July 2013 – monitoring and receipt of program income may continue indefinitely**

(6) Responsible Organization:

**Clark County Community Resources Management Division
500 S. Grand Central Parkway, PO Box 551212
Las Vegas, NV 89155-1212
702-455-5025
Michael J. Pawlak, Manager**

(7) Location Description: **Clark County, Nevada**

(8) Activity Description:

This activity will provide general administration and planning activities to include:

- **Contribution to a housing counseling and marketing pool with the other Clark County jurisdictions**
- **General management, oversight and coordination**
- **Professional Services**

(9) Total Budget: :

\$2,282,906 of Federal NSP and \$559,493 in State NSP funds over the five-year program period, beginning with pre-award activities as of September 29, 2008.

(10) Performance Measures

Clark County will effectively administer the Neighborhood Stabilization Program.

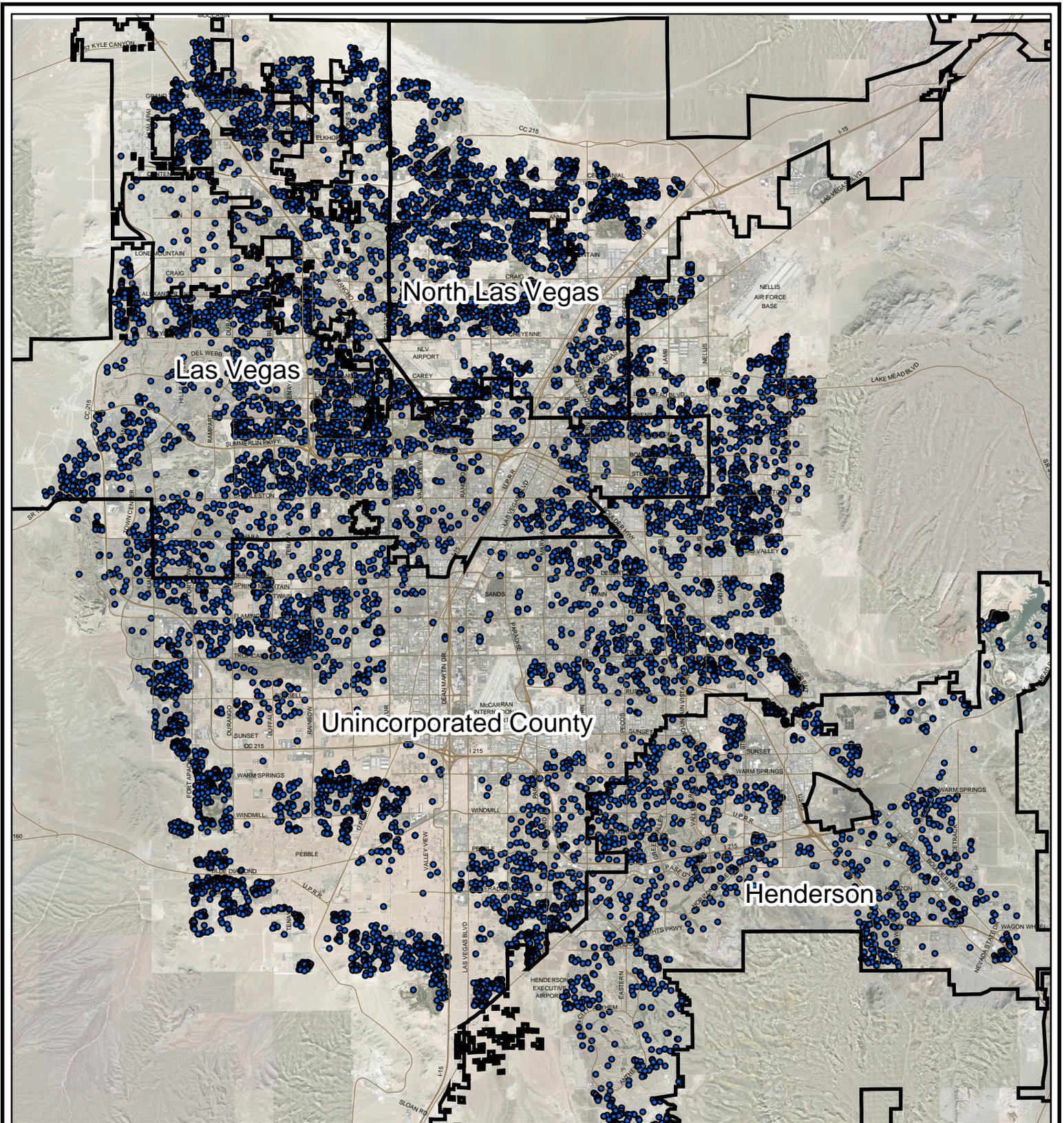
Exhibit 1: Clark County NSP Budget	Clark County Allocation	State of NV Allocation (County Portion)	TOTAL Allocation
NSP Allocation	\$22,829,062	\$8,056,784	\$30,885,846
NSP 50% AMI (25% Set-Aside)	\$5,781,266	\$2,309,727	\$8,090,993
Acquisition and Rehabilitation of Scattered Site Rental Housing Activity will be undertaken in conjunction with the Housing Authority of Clark County	\$2,207,266	\$5,309,727	\$7,516,993
Acquisition and Rehabilitation for Rental Will choose participating non-profits through RFQ or RFP	\$3,574,000		\$3,574,000
NSP 50% AMI Subtotal	\$5,781,266	\$5,309,727	\$11,090,993
NSP ADMINISTRATION 10% CAP	\$2,282,906	\$559,493	\$2,842,399
General management, oversight, and coordination	\$1,582,906	\$559,493	\$2,142,399
Professional services	\$700,000		\$700,000
NSP ADMIN Subtotal	\$2,282,906	\$559,493	\$2,842,399
NSP ACTIVITIES	\$14,838,890	\$5,187,564	\$20,026,454
Homebuyer Assistance Program in Targeted Census Tracts DPA @ \$25,000= 270 Homes/Families	\$6,800,000		\$6,800,000
Acquisition and Rehabilitation for Sale or Rental Acq/Rehab @ \$185,000= 45 Homes/Families	\$7,069,890	\$2,187,564	\$9,257,454
Housing Counseling	\$400,000		\$400,000
Demolition 3 units@ \$25,000	\$75,000		\$75,000
Redevelopment 3 units@ \$140,000	\$420,000		\$420,000
NSP Activities Subtotal	\$14,764,890	\$2,187,564	\$16,952,454
TOTAL	\$22,829,062	\$8,056,784	\$30,885,846

EXHIBIT 2: UNINCORPORATED CLARK COUNTY TARGET ZIP CODES AND CENSUS TRACTS

Zip Code	Census Tract	120% LMMI Eligible?	Foreclosure Rate	Subprime Loans	Predicted Foreclosure / Abandonment Score
89102	22.05	Y	12.1	45.4	9
89103	29.12	Y	11.2	40.6	9
	29.35	Y	8.8	28.5	8
	29.36	Y	9.6	32.3	9
	29.42	Y	9.5	31.5	9
	29.46	N	8.3	25.6	8
	29.48	Y	11.0	39.3	9
	29.49	Y	10.7	38.3	9
	29.54	Y	11.8	43.6	9
	29.55	Y	10.8	38.9	8
	29.56	Y	11.8	39.3	8
89104	15.00	Y	14.3	56.7	10
	16.09	Y	12.9	49.4	9
	16.10	Y	11.4	42.0	9
	16.11	Y	11.5	42.6	9
89110	49.07	N	8.2	25.1	8
	49.14	N	11.0	39.5	8
	49.15	Y	11.1	40.4	8
	49.18	N	9.2	30.0	9
	49.19	N	8.8	28.0	8
	49.20	Y	11.8	44.2	9
	49.21	Y	13.2	51.3	9
<i>Partial</i>	61.01	N	9.5	32.0	9
89115	47.03	Y	14.8	59.3	9
	47.08	Y	13.9	54.3	10
	47.07	Y	10.8	38.7	10
	47.09	Y	13.6	53.3	10
	47.10	Y	11.5	42.5	8
	47.11	Y	13.0	47.4	10
	47.12	Y	8.1	25.3	10
	47.13	Y	14.2	55.4	10
	47.14	Y	13.3	51.8	9
	47.16	Y	14.2	56.2	9
	47.17	Y	13.2	51.2	9
	60.00	N	11.9	44.2	10
89119	24.05	Y	15.4	61.3	9
	24.06	Y	11.4	41.6	10
	25.01	Y	9.1	29.6	9
	25.04	Y	9.8	33.4	9
	25.05	Y	8.6	25.2	8
	25.06	Y	11.6	42.5	10
	26.03	Y	8.7	26.3	9
	27.02	Y	12.3	46.6	10
	27.06	Y	10.9	39.6	9
	27.07	Y	10.9	39.0	9
	27.08	Y	8.8	28.2	8
Airport	27.09	N/A	N/A	N/A	N/A
89120	28.22	Y	12.8	48.9	10
	28.23	Y	10.0	34.4	9

Zip Code	Census Tract	120% LMMI Eligible?	Foreclosure Rate	Subprime Loans	Predicted Foreclosure / Abandonment Score
89121	16.07	Y	11.3	42.2	9
	16.08	Y	12.6	49.0	9
	16.12	Y	11.5	41.7	10
	16.13	Y	13.2	51.0	10
	17.06	N	8.9	28.3	9
	17.07	Y	8.9	28.3	9
	17.08	Y	10.5	37.3	10
	17.09	N	10.8	38.8	10
	17.10	Y	12.0	44.8	10
	17.11	Y	8.1	24.9	8
	17.12	Y	9.2	30.5	9
	17.13	Y	10.8	38.5	8
	17.14	Y	10.9	39.5	10
	17.15	Y	12.6	48.3	10
	17.16	Y	11.3	41.5	9
	17.17	N	8.1	24.4	10
	18.01	Y	12.0	44.6	10
	18.03	Y	11.8	43.9	10
	18.04	Y	12.6	48.0	9
89122	17.18	Y	13.2	51.6	10
	50.05	Y	11.1	40.5	10
	50.06	N	6.1	14.8	7
	50.07	N	8.5	26.5	10
	50.08	Y	9.6	32.4	10
	50.09	Y	10.5	37.1	10
	50.10	Y	12.6	48.2	10
	50.11	Y	12.1	45.4	10
	50.12	Y	10.3	37.4	10
<i>Partial</i>	61.01	N	9.5	32.0	9
89142	49.10	Y	10.5	37.2	10
	49.11	Y	11.6	42.5	10
	49.12	Y	12.7	48.2	10
	49.22	N	11.1	40.3	9
	49.23	N	9.2	29.8	9
	49.24	Y	12.1	45.2	10
<i>Partial</i>	61.01	N	9.5	32.0	9
89147	29.19	Y	10.4	36.3	9
	29.41	Y	10.8	38.6	8
89156	49.16	Y	11.8	44.1	10
	49.17	Y	9.7	32.9	9
	61.02	Y	12.7	48.3	10
	61.03	Y	10.3	36.1	10
	62.01	Y	13.0	50.1	10
	62.02	Y	11.9	43.9	10
	62.03	Y	11.3	41.3	9
	62.04	Y	11.5	42.5	10

Zip Code	Census Tract	120% LMMI Eligible?	Foreclosure Rate	Subprime Loans	Predicted Foreclosure / Abandonment Score
89169*	19.01	Y	11.9	44.9	9
	19.02	Y	11.5	42.5	9
<i>*Excluded</i>	23.00	N/A	N/A	N/A	N/A
	24.03	Y	10.4	37.6	10
	24.04	Y	11.1	26.7	10
	25.01	Y	9.1	29.6	9
	26.02	Y	10.0	31.8	9
*Census tract 23.00 encompasses two zip codes with the majority being in a non-eligible zip code. The portion that is in an eligible zip code is a high income area that includes a golf course and hotel/condo facilities					

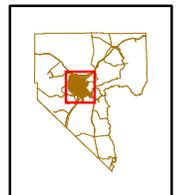


Legend

- Foreclosure by Parcel

Map 1: Las Vegas Valley Foreclosures

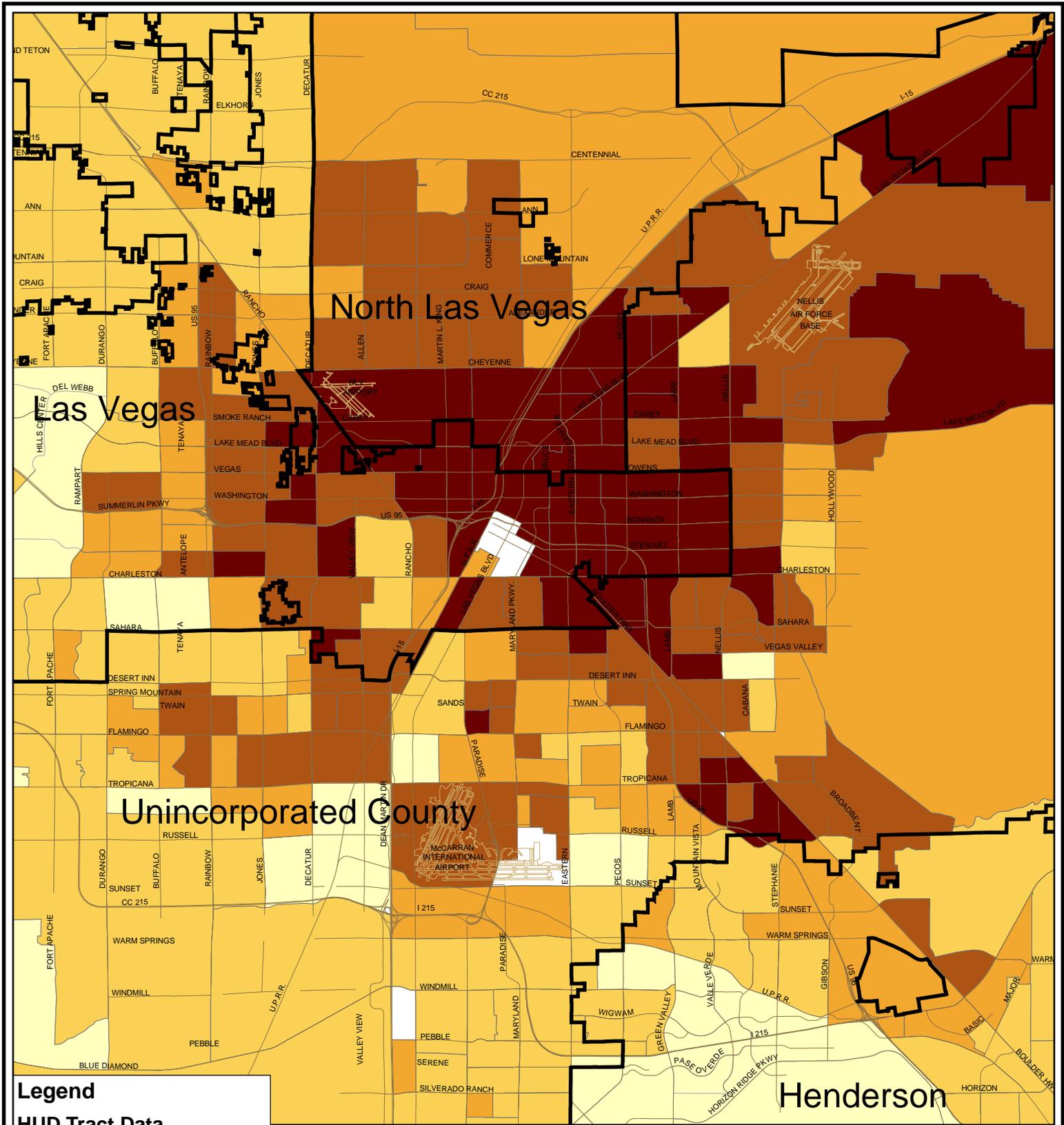
November 2, 2008



Vicinity Map - No Scale

Data Source: Applied Analysis, Inc.

Clark County, Nevada



Legend

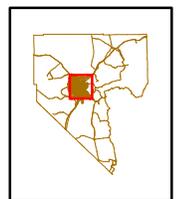
HUD Tract Data

Estimated Foreclosure Rate

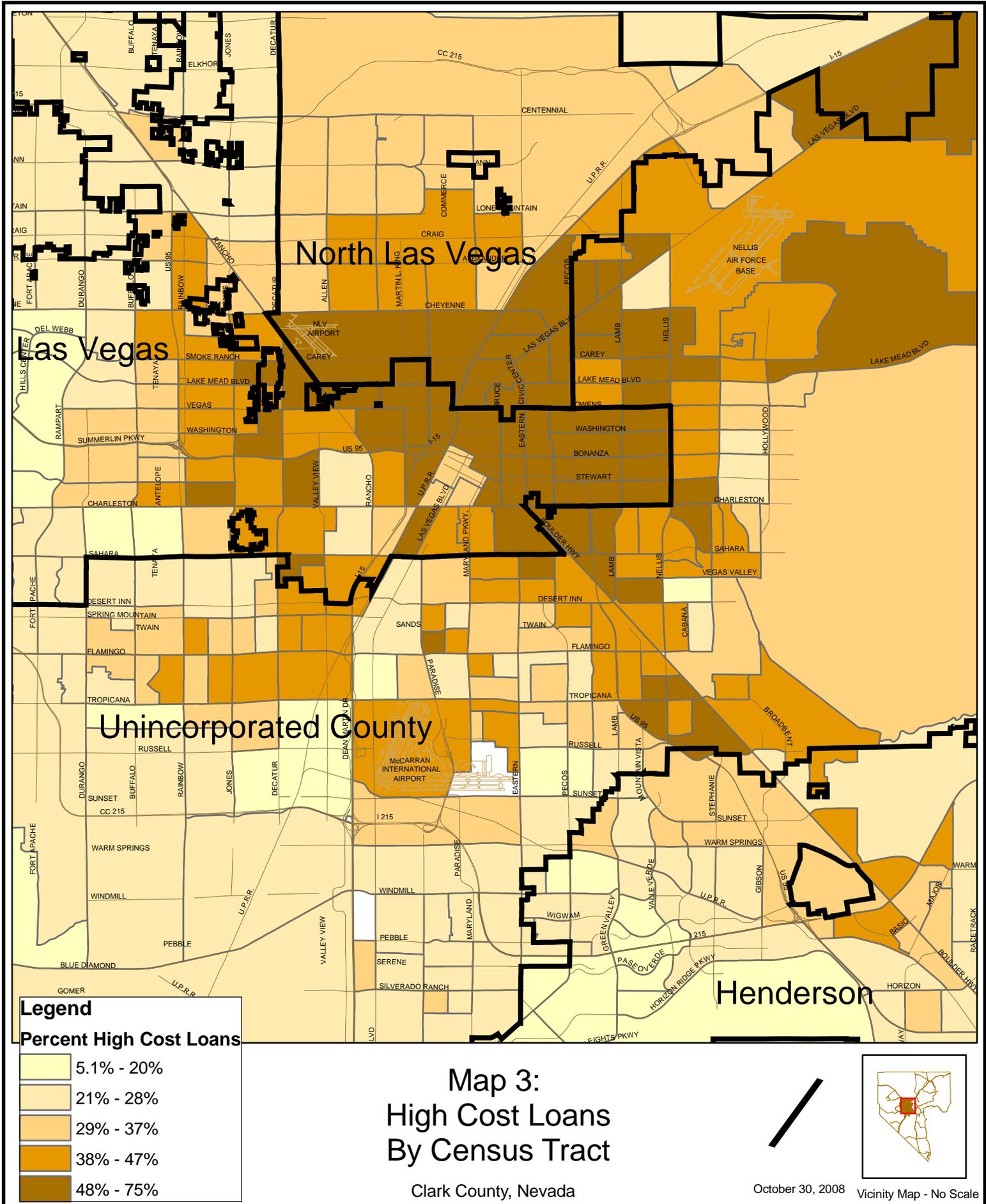
- 4% - 7%
- 8% - 9%
- 10%
- 11% - 12%
- 13% - 20%

Map 2:
Estimated Foreclosure
Rate by Tract
 Clark County, Nevada

October 30, 2008



Vicinity Map - No Scale



North Las Vegas

Las Vegas

Unincorporated County

Henderson

Legend

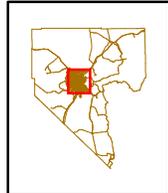
Percent High Cost Loans

5.1% - 20%
21% - 28%
29% - 37%
38% - 47%
48% - 75%

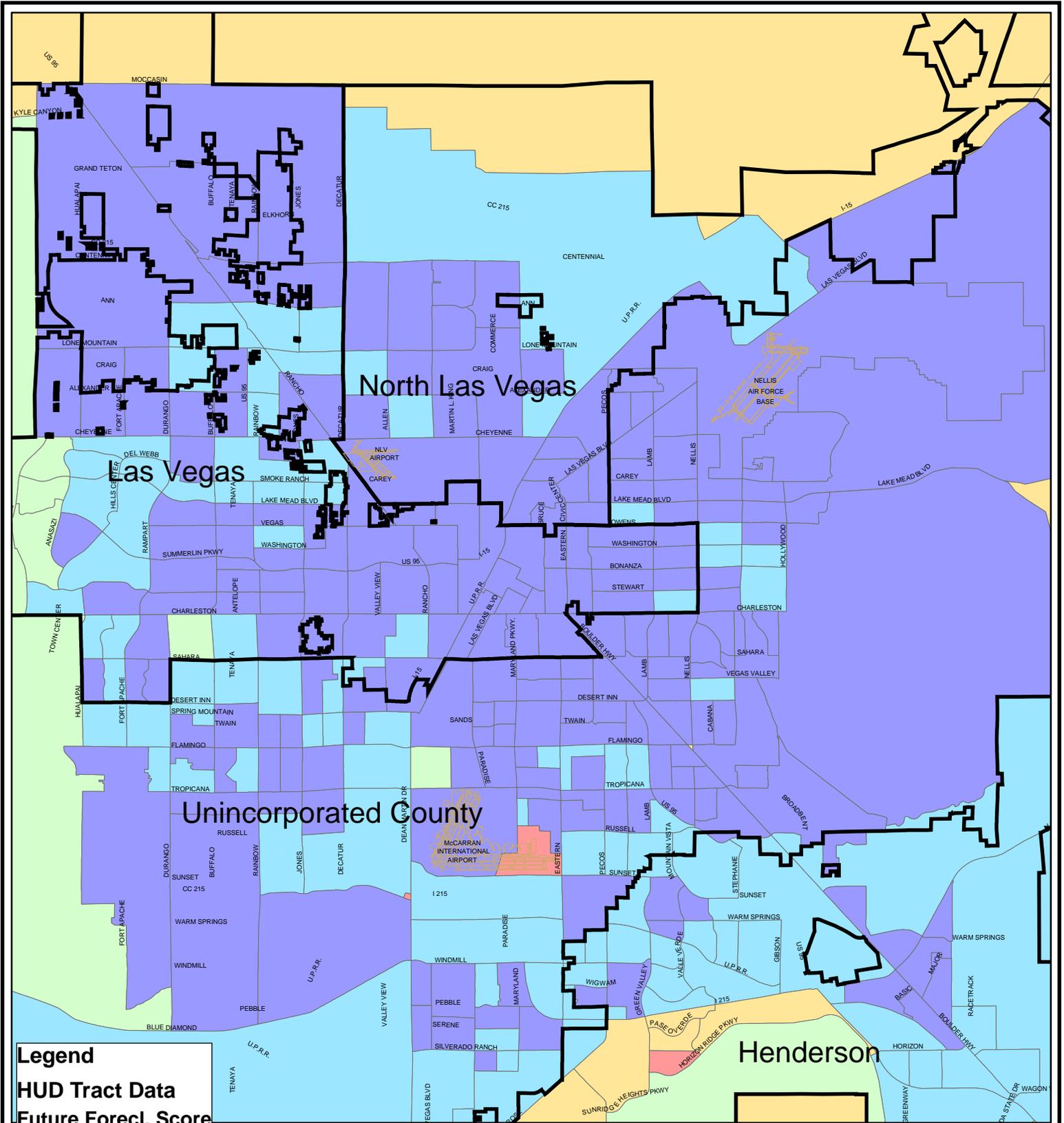
Map 3:
High Cost Loans
By Census Tract

Clark County, Nevada

October 30, 2008



Vicinity Map - No Scale



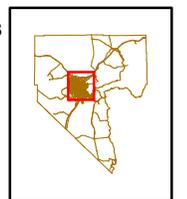
Legend
HUD Tract Data
Future Forecl. Score

- 0 - 2
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10

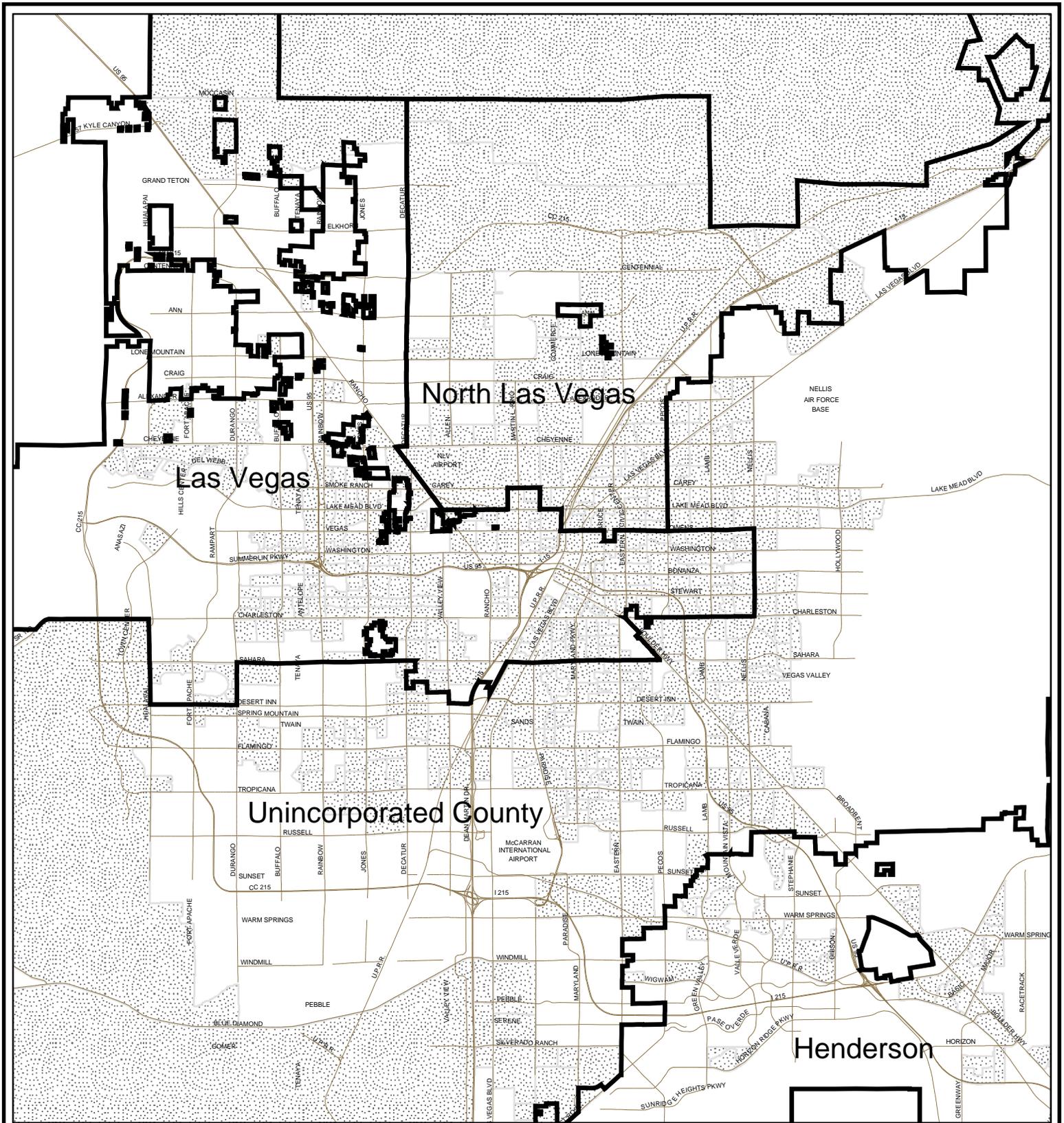
Map 4: HUD Score Predicting Future Foreclosure & Abandonment

Clark County, Nevada

November 2, 2008



Vicinity Map - No Scale



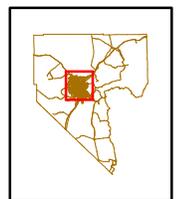
Legend

- 120% AMI or lower**
-  51% or more LowModMiddle

Map 5: Low/Mod/Middle Income Areas

Clark County, Nevada

November 2, 2008



Vicinity Map - No Scale

Map 6: NSP Target Neighborhoods

Clark County, Nevada

C
R
M

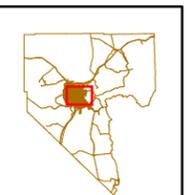


Legend

- Major Streets
- NSP Target Areas
- Low/Mod/Middle Income
- Areas Meeting Criteria*

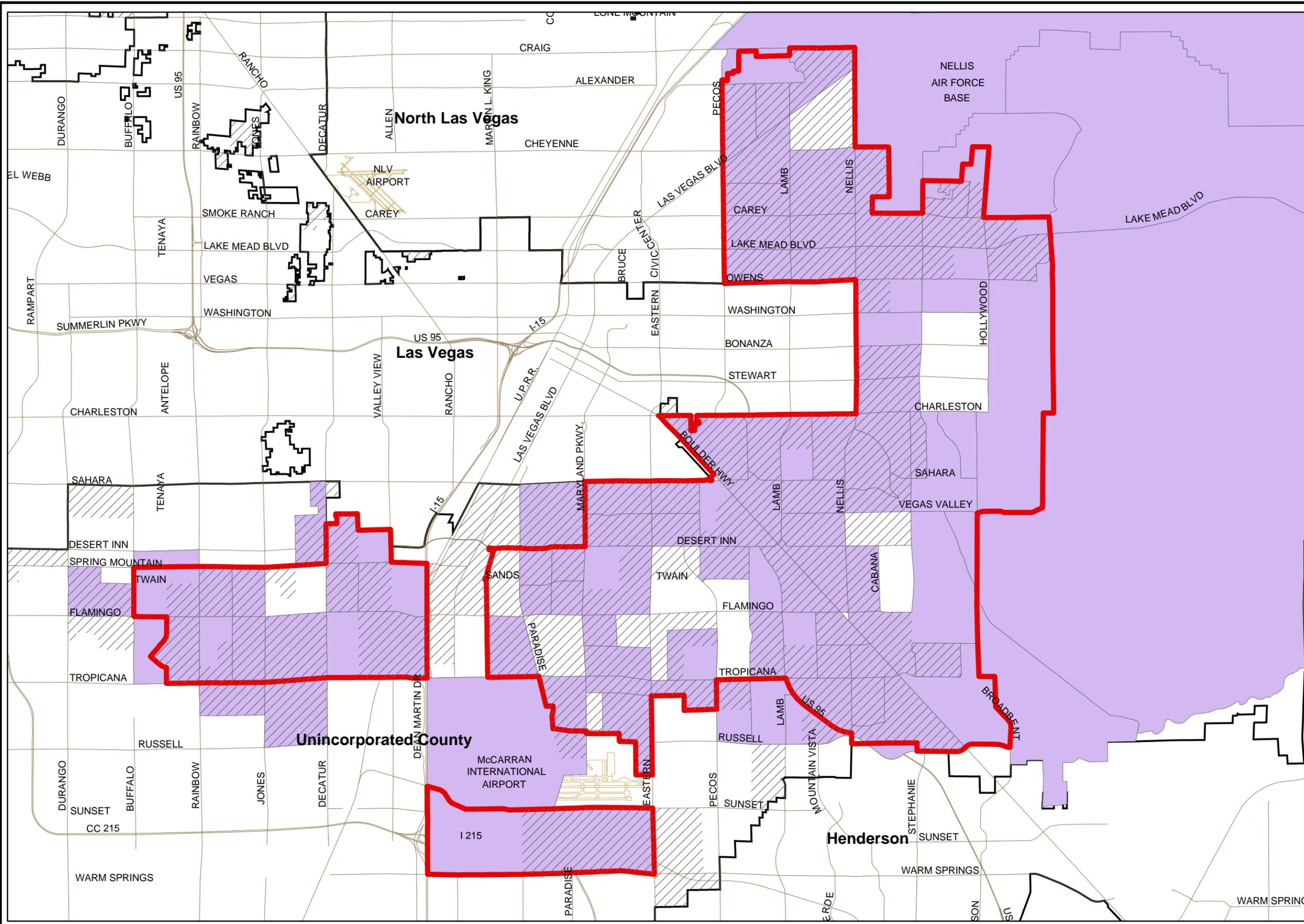
*Areas where majority of census tracts meet following criteria:
 >= 9% foreclosure rate and
 >= 8 future foreclosure score and
 >= 25% subprime loans and
 LMMI Eligible

November 7, 2008



Vicinity Map - No Scale

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



THE NSP SUBSTANTIAL AMENDMENT

SECTION B: NORTH LAS VEGAS

City of North Las Vegas Substantial Amendment to the 2008 Action Plan of The FY2005-2009 HUD Consolidated Plan

The City of North Las Vegas proposes to amend the Action Plan and Consolidated Plan for the purpose of fulfilling the application requirements to receive Neighborhood Stabilization Program (NSP) funds through the U.S. Department of Housing and Urban Development (HUD) authorized under Title III of the Housing and Economic Recovery Act of 2008 (HERA). As a subrecipient of Clark County, the City of North Las Vegas will submit its Substantial Amendment Plan as part of Clark County's Substantial Amendment Plan to HUD. HERA provides that funds be generally treated as Community Development Block Grant (CDBG) funds. Making proper application to HUD by December 1, 2008, will result in North Las Vegas receiving an allocation of \$6,837,736 to be used for the purpose of acquiring and/or redeveloping foreclosed properties that might otherwise become sources of abandonment and blight within their communities.

The City of North Las Vegas may also enter into intergovernmental or subrecipient agreements with other entitlements receiving NSP funds if areas of greatest need encompass more than one jurisdiction and would benefit from the combined effort. The City will receive \$1,814,256 from the State of Nevada NSP allocation, passed through Clark County.

AREAS OF GREATEST NEED

North Las Vegas is seriously impacted by the foreclosure crisis; 1,514 single-family homes were foreclosed in 2007 and in just the first six months of 2008, 2,619 single-family homes were forced into foreclosure. As Map A-1 indicates, virtually all of the City's neighborhoods are affected by this crisis.

Using Clark County Recorder data on foreclosures for the period January 1, 2008 through July 31, 2008, foreclosures were identified by zip code. Three zip codes, 89031, 89032 and 89081, had the largest number of foreclosures during that interval (Map A-2).

Areas With Greatest Percentage of Home Foreclosures

Using the Clark County Recorder data, the census tract/block group foreclosure density, breaks down as shown in Table 1, "Foreclosure Density Levels." Map A-3 depicts the foreclosure density by census tract/block group.

Areas with Highest Percentage of Homes Financed by a Subprime Mortgage

Current and accurate subprime lending data is not available locally. The data provided by HUD for the NSP application, identifying the foreclosure and abandonment risk scores, is the best available. To determine the census tracts with the highest percentage of homes financed by a subprime mortgage the "percentage of high cost loans" data was used. Table 2, "Percentage Mortgages Financed by Subprime Loan," shows the subprime loan data by census tract; Map A-4 illustrates the most predominant neighborhoods where homes were financed by a subprime loan.

Areas Likely to Face a Significant Rise in Rate of Home Foreclosure

Again, current and accurate data showing areas most likely to face a significant rise in foreclosure is not available; therefore the "abandonment and foreclosure risk score" data provided by HUD was used. Utilizing the "risk score," the census tracts/block groups most likely to face a significant rise in rate of home foreclosure are identified in Table 3, "Risk Score by Census Tract/Block Group," and in Map A-5.

OTHER FACTORS CONSIDERED TO DETERMINE AREAS OF GREATEST NEED

Low/Moderate/Middle Income (LMMI) Areas

Using the HUD data, Map A-6 identifies the census tracts/block groups that qualify as LMMI eligible areas. It is important to note that census tract 3603 is identified as eligible; however it is based on outdated 2000 census data. This has been a high growth area in North Las Vegas since 2000 and the current population is estimated at 3,722 while the census data has only 68 persons living in that census tract. Therefore, it is difficult to determine if census tract 3603 is, in fact, LMMI eligible without having more current

data. Table 4 lists the percentage of households at 120% AMI at the census tract/block group level.

AREAS OF GREATEST NEED

Using all of the data presented thus far, the City of North Las Vegas has determined that zip codes 89031, 89032, and 89081 have the greatest areas of need for the Neighborhood Stabilization Program. Within those zip codes, certain census tracts/block groups have been impacted more significantly; therefore the City will attempt to focus its efforts in those areas if possible.

To determine the most substantially affected census tracts/block groups, the four factors discussed above were considered: percentage of foreclosures, percentage of subprime loans, foreclosure risk scores, and LMMI eligibility percentage. Table 5, “Four Greatest Need Factors by Census Tracts/Block Groups,” lists all census tracts/block groups that meet at least three of the following criteria:

- Percentage of foreclosures above 3.99%
- Foreclosure risk score at 9 or 10
- 50% or more subprime loans, and
- 50% or more persons at 120% AMI or lower.

Map A-7 shows all census tracts/block groups with the greatest need that are found in Table 5.

The City is concerned that the NSP 15% discount requirement will have a negative impact on neighborhoods by driving down property values if too many foreclosed properties in one specific neighborhood are targeted; therefore assistance will be more widely dispersed within the identified areas of greatest need.

DISTRIBUTION AND USES OF FUNDS

The City’s number one priority areas for NSP funds are census tracts 3602 and 3700. Both census tracts are in the mature area of North Las Vegas and while they do not have the highest percentage of foreclosures, they do have foreclosure and abandonment risk scores of 10 (the highest possible score) as noted in Table 2, and have over 50% of homes financed by a subprime loan (Map A-4). Additionally, the neighborhoods in these census tracts will have a much more difficult time recovering from the foreclosure crisis than the neighborhoods in the newer sections of the City. Foreclosed homes in the newer neighborhoods will be absorbed more easily by the private market due to increased housing demand over the next few years.

The City will use NSP dollars for: an acquisition, rehab, resale program (see Activity 2); a homebuyer’s assistance program targeted at various neighborhoods within the areas of greatest need (see Activity 3); and a housing counseling program (see Activity 4).

To meet the 25% set-aside for 50% AMI, the dollars will be dedicated to two activities:

1. Purchase of a minimum of fourteen abandoned or foreclosed homes to be conveyed to non-profits selected through and RFQ process, to rehab, manage and rent to families below the 50% AMI (see Activity 1).
2. The City will purchase three vacant lots in the North Valley community with CDBG dollars and then deed those vacant lots to a non-profit selected through a RFQ process to build single-family homes for families below the 50% AMI. NSP dollars will be used for soils remediation and slab construction (see Activity 5).

DEFINITIONS AND DESCRIPTIONS

“Blighted Structure” shall mean a structure that:

- Meets the definition of “unsafe building” under the City of North Las Vegas Municipal Code, Chapter 15.72.120, which is: Buildings or structures regulated by this code and the technical codes which are structurally inadequate or have inadequate egress, or which constitute a fire hazard, or are otherwise dangerous to human life, for the purpose of this section, unsafe buildings.
- Not able to be restored to a safe condition.

“Affordable Rents” shall mean the Maximum Allowable HOME Rents as published by HUD from time to time. These rents also include utilities. If the tenant pays utilities, a utility allowance must be subtracted from the maximum allowable rent to determine the maximum contract rent.

“Continued affordability” shall 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.

“Housing Rehabilitation Standards” require that all buildings assisted with NSP funds are to be brought up to local code, that required building permits be obtained and that appropriate inspections are performed.

LOW INCOME TARGETING

The City will appropriate \$2,399,707 to be used for individuals or families whose incomes do not exceed 50% AMI.

ACQUISITIONS AND RELOCATION

At this time the City does not anticipate any relocation activity.

PUBLIC COMMENT

Following is a summary of public comments received: [comments will be added at the end of the public comment period]

NSP INFORMATION BY ACTIVITY

The City of North Las Vegas proposes to use the NSP funds in the following manner however, the City reserves the right to shift funding from one activity to another and from one agency to another as additional areas of greatest needs are identified, and according to availability of suitable properties, agency capacity, project readiness, and ability to meet the timeliness requirements of NSP; if such change requires an amendment, the City will file such amendment. Notwithstanding the foregoing, under all circumstances a minimum of 25% of NSP funds will be used for housing individuals and families whose incomes do not exceed 50% of AMI. The budget for all activities is found in Exhibit 1. (Activity Sheets follow)

ACTIVITY 1

(1) **Activity Name: NSP Acquisition and Rehabilitation for Rental**

(2) **Activity Type:**

NSP Eligible Use: Purchase, Rehab and Rent Foreclosed properties (HERA 2301(c)(3)(B))

**Eligible Activity: Acquisition (24CFR 270.201(a))
Eligible Rehabilitation and Preservation Activities (24 CFR 570.202)**

(3) **National Objective:**

24 CFR 570.208(a) (2) Limited clientele activity benefiting low income persons

(4) **Projected Start Date: March 2009**

(5) **Projected End Date: July 2010 – activity will continue with any program income**

(6) **Responsible Organization:**

**City of North Las Vegas
Office of Housing and Neighborhood Services
2240 Civic Center Dr.
North Las Vegas, NV 89030
702-633-1524
Kenneth Young, Administrator**

(7) **Location Description: Zip Codes 89031, 89032, 89081**

(8) **Activity Description:**

This activity will address neighborhood stabilization in zip codes 89031, 89032 and 89081, with priority given to 89032, through the acquisition, rehabilitation and renting of foreclosed properties. Purchase of specific foreclosed properties will be dependent on highest degree of neighborhood need in conjunction with availability of foreclosed, moderately priced properties. Funds used for this activity will be used to meet the low income housing requirement for those below 50% AMI.

The City of North Las Vegas will select and acquire these properties prior to selecting a non-profit agency to rehab and manage them as affordable rental housing. The City will not retain ownership; through an RFQ process, selected non-profits will own, operate, and manage these NSP properties. The tenure of

the beneficiaries will be rental and individual leases must be for at least one year. As currently interpreted, NSP considers rental revenue in excess of the cost of operating and maintaining the unit to be program income and must be returned to the City of North Las Vegas. The properties will remain affordable in perpetuity for those individuals below 50% AMI through deed restrictions.

All properties acquired under this activity must meet the required purchase discount of 5% less than current market appraised value, and must be as high as required to keep the total NSP portfolio within the required purchase discount level of 15%. As program income is received from NSP activities, neighborhood stabilization through rental activity may be expanded as funds permit.

I. Total Budget:

\$2,293,957 of NSP funds to purchase and rehab foreclosed properties (\$1,619,434 in federal NSP and \$674,523 in state NSP). It is estimated that the average discounted cost for these properties will be \$160,000. This budget includes purchase of home, closing costs, minor rehab costs, carrying costs and project delivery costs directly attributable to a specific address.

J. Performance Measures

14 units of housing to be acquired, rehabilitated (minor), and rented to households that are below 50% of median family income. Acquisition and rehabilitation for rental will help to stabilize property conditions and values in our target neighborhoods by rehabilitating the housing stock and renting those units to qualifying families. This new investment into the target areas should encourage other families to purchase and/or rehabilitate homes in the area. These formerly vacant properties will no longer be an enticement to vandals and thieves. The participating non-profit owner will maintain these units long-term. The influx of new families into the target areas will help to maintain local retail services that are struggling in the current economy.

ACTIVITY 2

(1) **Activity Name: NSP Purchase and Rehabilitation of Single-Family Housing**

(2) **Activity Type:**

NSP Eligible Use: Purchase and rehabilitate homes and residential properties that have been abandoned/vacant or foreclosed upon, in order to sell, rent or redevelop such homes and properties. (HERA 2301C(3)(b))

Eligible Activity: Acquisition, disposition, possible relocation, direct homeownership assistance, eligible rehabilitation and preservation activities for homes and other residential properties and housing counseling for those seeking to take part in the activity. (24 CFR 570.201(a) and 570.202)

(3) **National Objective:**

24 CFR 570.208(c) Housing assisted with NSP funds will provide permanent housing to low-, moderate- and middle-income persons

(4) **Projected Start Date: March 2009**

(5) **Projected End Date: September 2010 – activity will continue with any program income.**

(6) **Responsible Organization:**

**City of North Las Vegas
Office of Housing and Neighborhood Services
2240 Civic Center Dr.
North Las Vegas, NV 89030
702-633-1524
Kenneth Young, Senior Assistant to the City Manager**

The City of North Las Vegas will administer the revolving loan fund and will select development partners through a competitive request for proposals process.

(7) **Location Description: Eligible Census Tracts 89031, 89032, and 89081**

(8) **Activity Description:**

The purpose of the program is to acquire and rehabilitate foreclosed and abandoned homes in heavily impacted neighborhoods and resell them to

program-eligible owner-occupants. Using NSP funds (and other lines of credit as available) the City will purchase the abandoned and/or foreclosed homes and then convey these properties to non-profit organizations selected by the City through a competitive RFP/RFQ process to rehabilitate them to City housing standards. Homes may be purchased individually or through a bulk sale. Upon completion of rehabilitation, homes would be marketed to eligible buyers. This activity will provide affordable homeownership opportunities for households earning less than 120% AMI.

All properties acquired under this activity must meet the required purchase discount of 5% less than current market appraised value, and must be as high as required to keep the total NSP portfolio within the required purchase discount level of 15%. The discounted price shall be supported by an appraisal meeting the requirements of the Notice.

The City will provide funds for the acquisition, rehabilitation and redevelopment of the homes to include related eligible development and activity delivery costs, sales and closing costs, and reasonable developer's fees. The /non-profit/developer will then sell each home to an eligible buyer. It is anticipated that the new purchasers will be provided with homebuyer assistance in the form of down payment assistance, closing costs, interest rate buy down, principal reduction or other financing mechanisms as described in Activity 3.

As an alternative to sale, the City may authorize the home to be transferred to the rental program described in Activity 1.

Funds repaid by the non-profit/developer from sale proceeds will be treated as program income according to the terms of the Notice and used to fund additional NSP activities.

(9) Total Budget:

\$2,319,528 in federal NSP funds and \$30,238 in state NSP funds will be used to purchase abandoned/vacant or foreclosed properties and provide rehabilitation. It is estimated that the average discounted cost for these properties will be \$185,000. This budget includes purchase of home, closing costs, rehab costs, carrying costs and project delivery costs directly attributable to a specific address.

(10) Performance Measures

Thirteen households with income at 120% AMI or lower will be assisted to purchase rehabilitated abandoned/vacant or foreclosed homes. An additional 50 households may be assisted as the program income is reused for this activity.

Acquisition and rehabilitation for resale will help to stabilize property conditions and values in our target neighborhoods by rehabilitating and modernizing older housing stock and then assisting families to purchase and occupy vacant properties. Rehabilitation will incorporate energy efficiency and conservation measures that will reduce household utility costs thereby providing more disposable income to the new owners. This new investment into the target areas should encourage other families to purchase and/or rehabilitate homes in the area. These resale purchases will be undertaken using traditional 30-year, fixed rate loan products, thereby stopping the cycle of foreclosures that have resulted from exotic loan products. The influx of new families into the target areas will help to maintain local retail services that are struggling in the current economy and to help stabilize school enrollment

ACTIVITY 3

(1) Activity Name: **NSP Home Buyer Assistance (HAP)**

(2) Activity Type:

NSP Eligible Use: Establish financing mechanisms (HERA 2301(c)(3)(A))

Eligible Activity: Direct homeownership assistance (24CFR 270.201(n))

(3) National Objective:

24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% MFI permitted under NSP)

(4) Projected Start Date: **March 2009**

(5) Projected End Date: **July 2010 – activity will continue with any program income.**

(6) Responsible Organization:

**City of North Las Vegas
Office of Housing and Neighborhood Services
2240 Civic Center Dr.
North Las Vegas, NV 89030
702-633-2333
Beth Posey, Administrator**

Using an RFQ process, non-profits will be identified to administer the HAP program.

(7) Location Description: **Zip Codes 89031, 89032, 89081**

(8) Activity Description:

The City of North Las Vegas' NSP Home Buyer Assistance Program will address neighborhood stabilization in zip codes 89031, 89032, and 89081. This program will be operated through designated participating non-profits and will provide up to \$20,000 for a variety of financial mechanisms to include but not be limited to: down payment financial assistance, soft-seconds, loan-loss reserves, interest rate reduction, to eligible 120% AMI or below households to assist them in becoming homeowners.

Financial assistance to the homebuyer will be in the form of a zero interest, deferred payment loan, secured by a deed of trust. The minimum amount of any loan will be \$1,000 and the maximum amount will not exceed \$30,000. NSP funds will be recaptured upon sale, transfer or change of ownership of the assisted property. Refinancing of the NSP-assisted property is permissible only

to refinance the existing mortgage to a lower interest rate thereby reducing the monthly payment on the first mortgage by a minimum of \$100.

The homebuyer will be required to:

- Have a total gross income at or below the 120% of the area's median income, adjusted for family size.
- Ascertain the necessary 5 - 15% discount on the selected foreclosed home in North Las Vegas (all properties acquired under this activity must meet the required purchase discount of 5% less than current market appraised value, and must be as high as required to keep the total NSP portfolio within the required purchase discount level of 15%).
- Occupy the home as a principal residence
- Qualify for a first mortgage through a pre-approved lender
- Complete a City approved, eight hour homebuyer training program
- Accept specific deed restrictions, including repayment of the loan upon sale, transfer of title, refinancing of the first mortgage, or leasing of the property.

I. Total Budget:

\$2,000,000 of federal NSP funds and \$1,000,000 state NSP funds will be used for home buyer assistance. It is estimated that the average discounted cost for these properties will be \$185,000.

J. Performance Measures

100 - 150 households with income at 120% AMI or lower will be assisted with homebuyer assistance to purchase foreclosed homes in North Las Vegas. The actual number assisted will depend on the amount of assistance (between \$1,000 and \$30,000) given to each household.

Homeownership assistance will help to stabilize property values in our target neighborhoods by assisting families to purchase and occupy vacant properties. This new investment of public funds into the target areas should stimulate private investment as other families purchase and/or rehabilitate homes in the area. These purchases will be undertaken using traditional 30-year, fixed rate loan products, thereby stopping the cycle of foreclosures that have resulted from exotic loan products. The influx of new families into the target areas will help to maintain local retail services that are struggling in the current economy.

ACTIVITY 4

(1) Activity Name: **NSP Housing Counseling**

(2) Activity Type:

NSP Eligible Use: **Housing Counseling (HERA 2301C(3)(A) & (B))**

Eligible Activity: **Limited Clientele (LMMI) (24 CFR 570.208(A)(2))**

(3) National Objective:

24 CFR 570.208(a)(2) Limited clientele activity benefiting low and moderate income persons (up to 120% AMI permitted under NSP)

(4) Projected Start Date: **March 2009**

(5) Projected End Date: **July 2013**

(6) Responsible Organization:

**City of North Las Vegas
Office of Housing and Neighborhood Services
2240 Civic Center Dr.
North Las Vegas, NV 89030
702-633-1524
Kenneth Young, Senior Assistant to the City Manager**

Using a Request for Qualifications process, non-profits will be identified to participate in the housing counseling portion of the NSP.

(7) Location Description: **Zip Codes 89031, 89032 and 89081**

(8) Activity Description:

The City of North Las Vegas, along with other Las Vegas Valley jurisdictions, will allocate funds to qualified, HUD Certified Housing Counseling Agencies based upon a Request for Qualifications. In order to identify households at 120% AMI and below that will qualify for homeownership, on average it is necessary to provide homeownership counseling to approximately 10 people/households in order to identify 1 eligible homebuyer. The households receiving this housing counseling will include homeowners planning on participating in any of the NSP programs for homeownership. These households will receive at least eight hours of counseling.

(9) Total Budget:

\$125,000 of federal NSP funds.

(10) Performance Measures

Approximately 4,000 households throughout the Las Vegas Valley will receive housing counseling in order to prepare them for homeownership using NSP funds. Helping families understand how to properly budget their income and teaching them the ins and outs of homeownership will make them more stable and responsible homeowners. Ultimately this should help to reduce the foreclosure rate and protect the homeowner's equity over time.

ACTIVITY 5

(1) Activity Name: **Single Family Home Construction**

(2) Activity Type:

NSP Eligible Use: Redevelopment (HERA 2301(c)(3)(E))

**Eligible Activity: Disposition of Property 24 CFR 570.201 (b)
Housing Construction 24 CFR 570,201 (m)**

(3) National Objective:

24 CFR 570.208(a) (2) Limited clientele activity benefiting low income persons

(4) Projected Start Date: **March 2009**

(5) Projected End Date: **July 2010 – activity will continue with any program income**

(6) Responsible Organization:

**City of North Las Vegas
Office of Housing and Neighborhood Services
2240 Civic Center Dr.
North Las Vegas, NV 89030
702-633-1524
Kenneth Young, Administrator**

(7) Location Description:

**1929 Hart – North Las Vegas NV 89032
1717 Bluff – North Las Vegas, NV 89032
1729 Bluff – North Las Vegas, NV 89032**

(8) Activity Description:

This activity will address neighborhood stabilization in census tract 3602, within two neighborhoods in the North Valley Community. The City of North Las Vegas will purchase three vacant lots with current CDBG dollars and then convey the properties to a local non-profit to redevelop for single-family housing. The City's use of NSP funds will be for remediation of the problematic soils, thereby allowing construction of the homes, and NSP funds will also be used for the construction of the foundation slabs.

The tenure of the beneficiaries will be homeownership and the properties will remain affordable in perpetuity for those individuals below 50% AMI through deed restrictions.

I. Total Budget:

\$105,750 of NSP funds (\$90,000 in federal NSP and \$15,750 in state NSP) to remediate soils and construct foundation slabs for single family housing that will provide affordable housing for families below 50% AMI. There will also be approximately \$402,500 of private leveraging for this activity.

J. Performance Measures

Three units of single-family housing will be constructed and sold to households that are below 50% of median family income. These sites are generally the target of vandals and bring property values down in the surrounding neighborhood. The redevelopment of these sites with new housing units will help stabilize property values, possibly even increasing property values for those homes closest to the redevelopment sites.

ACTIVITY 6

(1) Activity Name: **Administration**

(2) Activity Type:

NSP Eligible Use: Administration and Planning Costs (HERA 2301(c)(3))

Eligible Activity: Direct homeownership assistance (24CFR 270.205 and 24 CFR 270.206)

(3) National Objective:

To administer activities that benefit low and moderate income persons under 24 CFR 570.208(a)(2) and potentially under CFR 570.208 (a) (1) (up to 120% MFI permitted under NSP)

(4) Projected Start Date: **October 2008 - reimbursement for pre-award costs allowed**

(5) Projected End Date: **July 2013 – monitoring and receipt of program income may continue indefinitely**

(6) Responsible Organization:

**Office of Housing and Neighborhood Services
2240 Civic Center Dr.
North Las Vegas, NV 89030
702-633-2333
Kenneth Young, Administrator**

(7) Location Description: **City of North Las Vegas**

(8) Activity Description:

This activity will provide general administration and planning activities to include:

- **Administration of NSP activities**
- **Miscellaneous and Professional Services as needed**

I. Total Budget:

\$777,519 of NSP funds (\$683,774 in federal NSP and \$93,745 in state NSP) over the five-year program period, beginning with pre-award activities as of September 29, 2008.

J. Performance Measures

- 1. City of North Las Vegas will successfully complete necessary administrative and planning activities to receive NSP funds.**
- 2. 100% of NSP funds will be accurately administered.**
- 3. NSP activities 1, 2, 3, 4 and 5 will be completed**

Exhibit 1: North Las Vegas NSP Budget

	NLV Direct Allocation	State of NV Allocation	TOTAL Allocation
Total NSP Allocation	\$6,837,736	\$1,814,256	\$8,651,992
NSP 50% AMI (25% Set-Aside)	\$1,709,434	\$690,273	\$2,399,707
Acquisition and Rehabilitation for Rental Housing	\$1,619,434	\$674,523	\$2,293,957
Redevelopment of 3 Properties in North Valley	\$90,000	\$15,750	\$105,750
NSP 50% AMI Subtotal	\$1,709,434	\$690,273	\$2,399,707
NSP ADMINISTRATION 10% CAP	\$683,774	\$93,745	\$777,519
General management, Oversight, and coordination	\$583,774	\$93,745	\$677,519
Professional services	\$100,000	\$0	\$100,000
NSP ADMIN Subtotal	\$683,774	\$93,745	\$777,519
NSP 120% AMI ACTIVITIES	\$4,444,528	\$1,030,238	\$5,474,766
Acquisition, Rehabilitation and Resale of Single Family Housing	\$2,319,528	\$30,238	\$2,349,766
Homebuyer Assistance Program	\$2,000,000	\$1,000,000	\$3,000,000
Targeted Zipcodes 89031, 89081, 89032			
Housing Counseling	\$125,000	\$0	\$125,000
NSP Activities Subtotal	\$4,444,528	\$1,030,238	\$5,474,766
TOTAL	\$6,837,736	\$1,814,256	\$8,651,992

TABLE 1 – FORECLOSURE DENSITY LEVELS

Foreclosure Density Levels	Census Tract	Block Group
5 - 5.9%	003603	Block 1
	003605	Block 1
	003608	Blocks 1 & 3
	003614	Block 4
4-4.9%	003602	Block 1
	003604	Block 1
	003605	Block 2
	003607	Blocks 1 & 2
	003611	Block 2
	003612	Block 3
	003613	Blocks 2 & 3
	003614	Block 2
	003615	Block 2
003800	Block 4	
3-3.9%	003602	Block 2
	003604	Block 2
	003606	Blocks 2 & 3
	003608	Block 2
	003609	Block 4
	003610	Blocks 2 & 4
	003611	Block 1
	003612	Blocks 1 & 2
	003613	Block 4
	003614	Block 3
	003615	Block 1
	004200	Block 2
	004300	Block 1
004600	Block 3	
2-2.9%	003604	Block 3
	003610	Blocks 1 & 3
	003613	Block 1
	003614	Block 1
	003700	Block 2
	003800	Block 3
	004000	Block 1
	004100	Blocks 3 & 4
	004200	Block 1
	004300	Block 2
	004400	Block 3
	004500	Blocks 1, 2 & 3
004600	Blocks 1 & 2	
0-1.9%	003603	Block 2
	003606	Block 1

TABLE 1 – FORECLOSURE DENSITY LEVELS

Foreclosure Density Levels	Census Tract	Block Group
	003607	Block 3
	003609	Blocks 1,2 & 3
	003700	Block 1
	003800	Blocks 1 & 2
	004000	Block 2
	004100	Blocks 1 & 2
	004400	Blocks 1, 2 & 4

**TABLE 2 – PERCENTAGE MORTGAGES FINANCED BY SUBPRIME LOAN
BY CENSUS TRACT/BLOCK GROUPS**

Census Tract	Block Group	Percentage Financed by Subprime Loan
003602	1	51%
003602	2	51%
003603	1	30%
003603	2	30%
003604	1	35%
003604	2	35%
003604	3	35%
003605	1	35%
003605	2	35%
003606	1	30%
003606	2	30%
003606	3	30%
003607	1	36%
003607	2	36%
003607	3	36%
003608	1	37%
003608	2	37%
003608	3	37%
003609	1	29%
003609	2	29%
003609	3	29%
003609	4	29%
003610	1	37%
003610	2	37%
003610	3	37%
003610	4	37%
003611	1	38%
003611	2	38%
003612	1	36%
003612	2	36%
003612	3	36%
003613	1	39%

**TABLE 2 – PERCENTAGE MORTGAGES FINANCED BY SUBPRIME LOAN
BY CENSUS TRACT/BLOCK GROUPS**

Census Tract	Block Group	Percentage Financed by Subprime Loan
003613	2	39%
003613	3	39%
003613	4	39%
003614	1	43%
003614	2	43%
003614	3	43%
003614	4	43%
003615	1	38%
003615	2	37%
003700	1	55%
003700	2	55%
003800	1	52%
003800	2	52%
003800	3	52%
003800	4	52%
004000	1	52%
004000	2	52%
004100	1	55%
004100	2	55%
004100	3	55%
004100	4	55%
004200	1	55%
004200	2	55%
004300	1	51%
004300	1	51%

TABLE 3 – RISK SCORE BY CENSUS TRACT/BLOCK GROUP

Census Tract	Block Group	Risk Score
003602	1	100
003602	2	100
003603	1	80
003603	2	80
003604	1	90
003604	2	90
003604	3	90
003605	1	90
003605	2	90
003606	1	90
003606	2	90
003606	3	90
003607	1	90
003607	2	90
003607	3	90
003608	1	90
003608	2	90
003608	3	90
003609	1	80
003609	2	80
003609	3	80
003609	4	80
003610	1	90
003610	2	90
003610	3	90
003610	4	90
003611	1	90
003611	2	90
003612	1	90
003612	2	90
003612	3	90
003613	1	80
003613	2	80

TABLE 3 – RISK SCORE BY CENSUS TRACT/BLOCK GROUP

Census Tract	Block Group	Risk Score
003613	3	80
003613	4	80
003614	1	90
003614	2	90
003614	3	90
003614	4	90
003615	1	100
003615	2	100
003700	1	100
003700	2	100
003800	1	100
003800	2	100
003800	3	100
003800	4	100
004000	1	100
004000	2	100
004100	1	90
004100	2	90
004100	3	90
004100	4	90
004200	1	100
004200	2	100
004300	1	90
004300	1	90

TABLE 4 – PERCENTAGE OF HOUSEHOLDS AT 120 % AMI OR LOWER

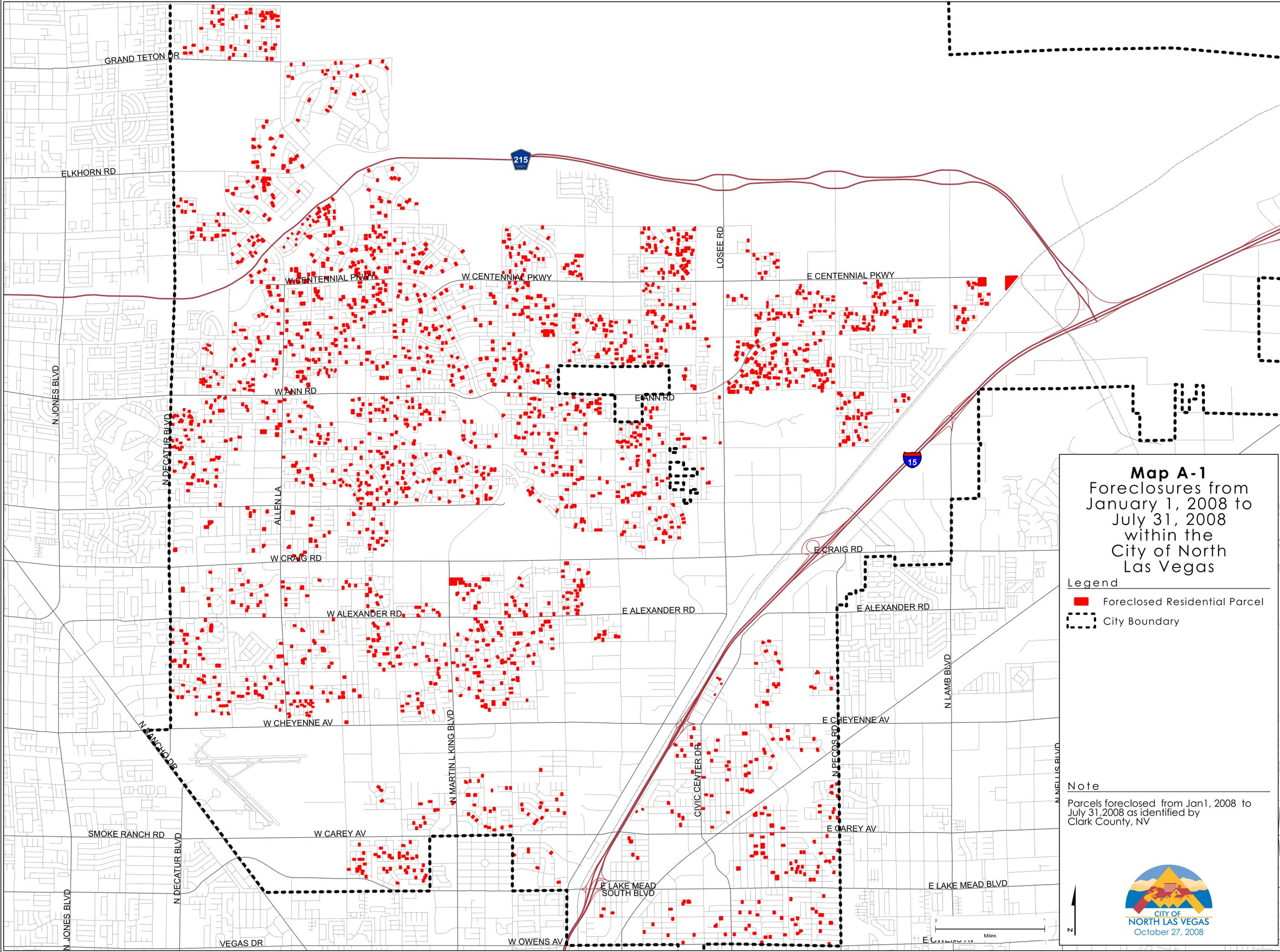
Census Tract	Block Group	120 Percent AMI
003602	1	86%
003602	2	77%
003603	1	99%
003603	2	0%
003604	1	51%
003604	2	57%
003604	3	60%
003605	1	59%
003605	2	53%
003606	1	35%
003606	2	39%
003606	3	48%
003607	1	34%
003607	2	48%
003607	3	33%
003608	1	46%
003608	2	52%
003608	3	54%
003609	1	49%
003609	2	43%
003609	3	48%
003609	4	38%
003610	1	32%
003610	2	48%
003610	3	60%
003610	4	48%
003611	1	67%
003611	2	53%
003612	1	38%
003612	2	66%
003612	3	52%
003613	1	44%
003613	2	49%

TABLE 4 – PERCENTAGE OF HOUSEHOLDS AT 120 % AMI OR LOWER

Census Tract	Block Group	120 Percent AMI
003613	3	62%
003613	4	77%
003614	1	59%
003614	2	44%
003614	3	52%
003614	4	82%
003615	1	55%
003615	2	68%
003700	1	79%
003700	2	87%
003800	1	87%
003800	2	82%
003800	3	93%
003800	4	86%
004000	1	89%
004000	2	84%
004100	1	86%
004100	2	80%
004100	3	76%
004100	4	76%
004200	1	87%
004200	2	88%
004300	1	81%
004300	1	91%

TABLE 5 – FOUR GREATEST NEED FACTORS BY CENSUS TRACTS/BLOCK GROUPS

Census Tract	Block Group	Foreclosure Percentage	Risk Score	Subprime Loan Percentage	120 %AMI
3700	1	4.8	100	55%	79%
3700	2	1.0	100	55%	87%
4200	1	1.8	100	55%	87%
4200	2	3.5	100	55%	88%
3800	1	1.8	100	52%	87%
3800	2	0.0	100	52%	82%
3800	3	2.4	100	52%	93%
3800	4	4.8	100	52%	86%
4000	1	2.8	100	52%	89%
4000	2	1.4	100	52%	84%
3602	1	4.0	100	51%	86%
3602	2	4.0	100	51%	77%
3615	2	4.8	100	37%	68%
4100	1	1.8	90	55%	86%
4100	2	1.6	90	55%	80%
4100	3	2.4	90	55%	76%
4100	4	2.6	90	55%	76%
4300	1	3.3	90	51%	81%
4300	1	2.3	90	51%	91%
3614	4	5.1	90	43%	82%
3611	2	4.5	90	38%	53%
3608	1	5.6	90	37%	46%
3608	3	5.5	90	37%	54%
3612	2	4.0	90	36%	66%
3612	3	4.3	90	36%	52%
3607	1	4.4	90	36%	34%
3607	2	4.3	90	36%	48%
3604	1	4.1	90	35%	51%
3605	1	5.6	90	35%	59%
3605	2	4.0	90	35%	53%
3613	2	4.2	80	39%	49%
3613	3	4.7	80	39%	62%
3613	4	3.7	80	39%	77%
3603	1	5.3	80	30%	99%



Map A-1
 Foreclosures from
 January 1, 2008 to
 July 31, 2008
 within the
 City of North
 Las Vegas

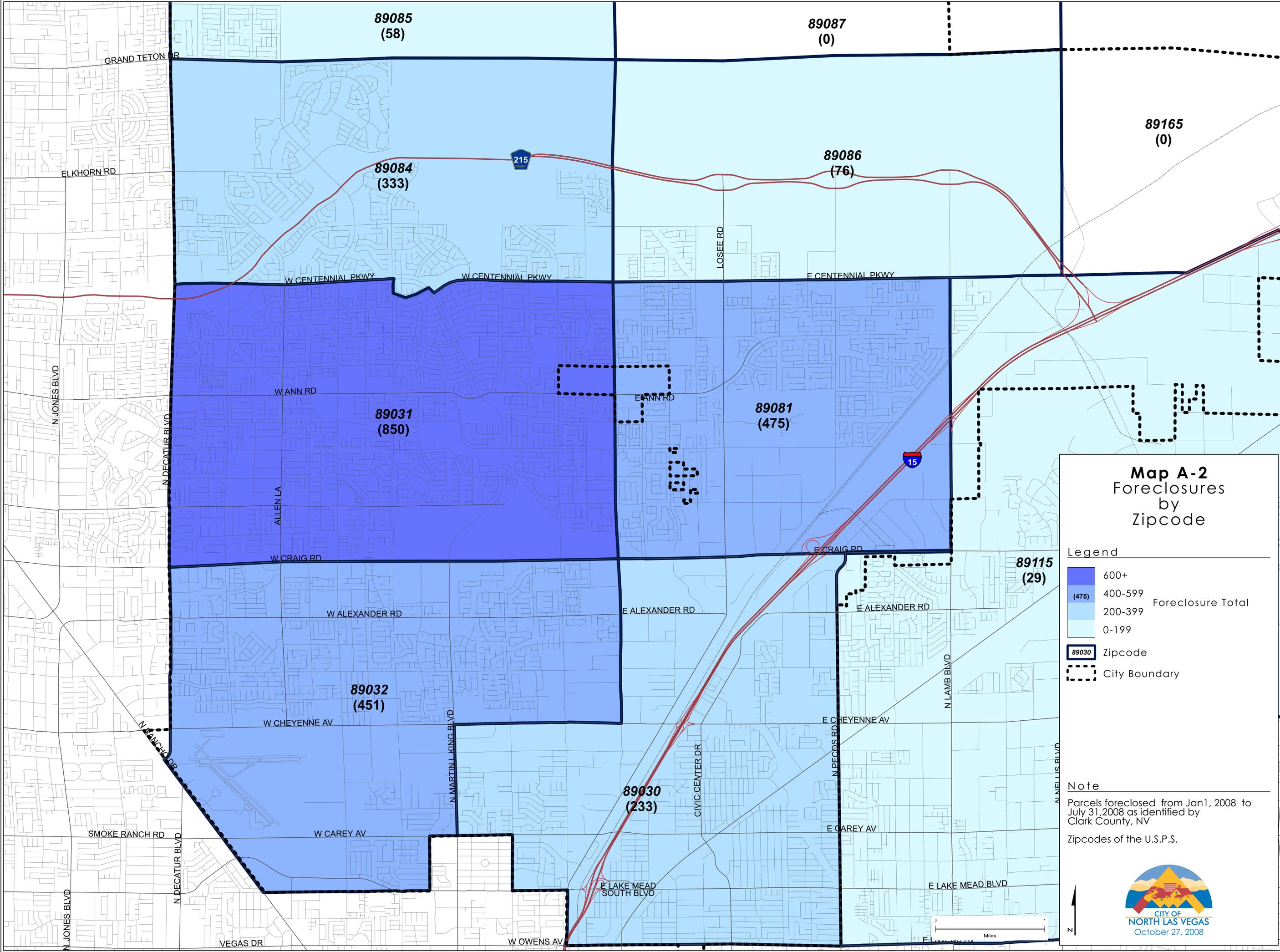
- Legend**
- Foreclosed Residential Parcel
 - City Boundary

Note
 Parcels foreclosed from Jan 1, 2008 to
 July 31, 2008 as identified by
 Clark County, NV



Scale bar: 0 to 1 Miles





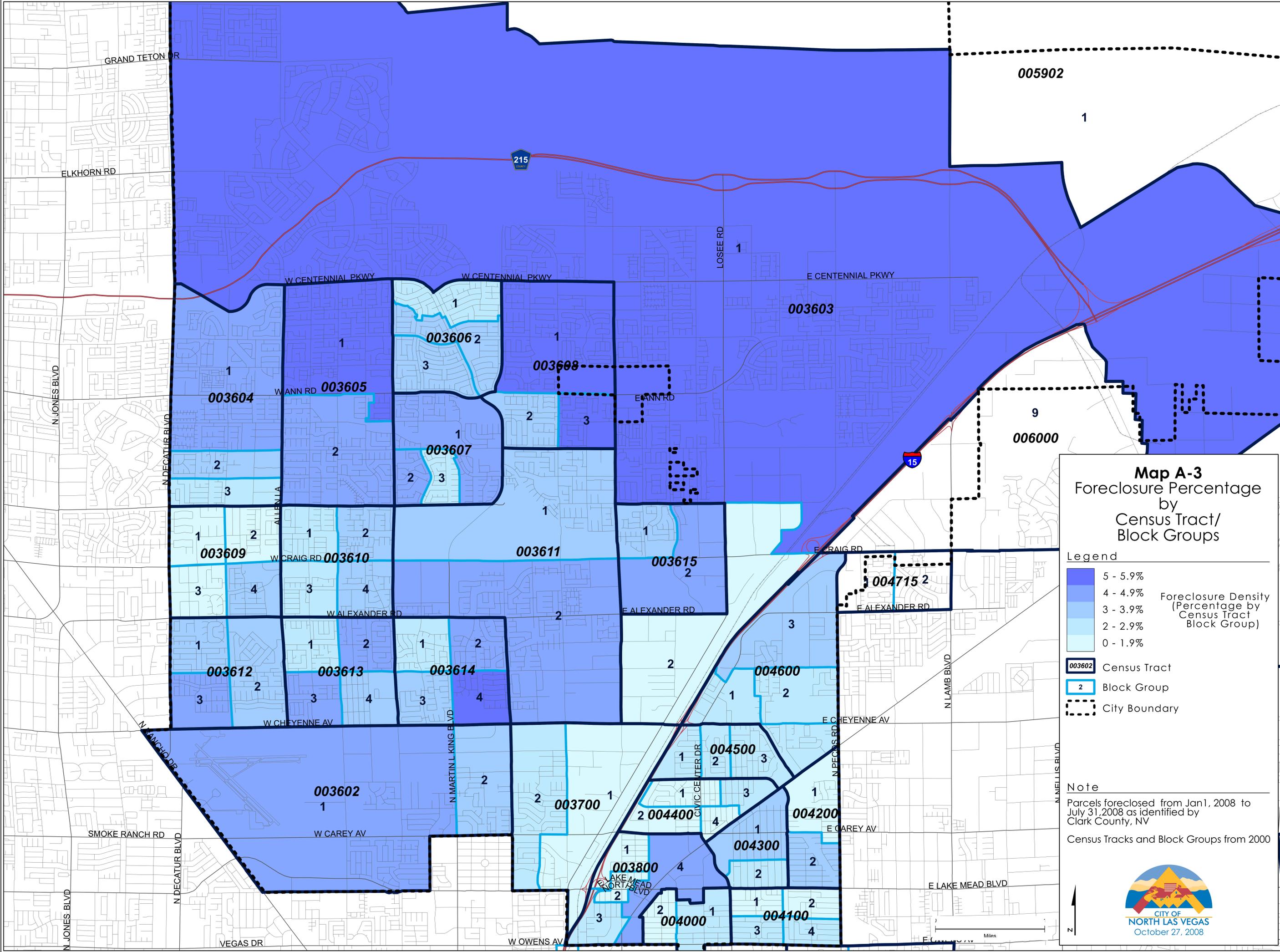
Map A-2 Foreclosures by Zipcode

Legend

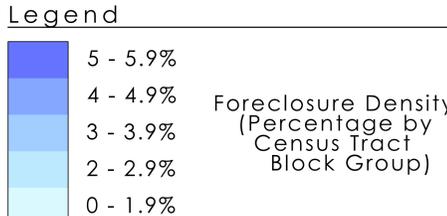
	600+	Foreclosure Total
	(475) 400-599	
	200-399	
	0-199	
	89030	Zipcode
		City Boundary

Note
 Parcels foreclosed from Jan1, 2008 to July 31, 2008 as identified by Clark County, NV
 Zipcodes of the U.S.P.S.





Map A-3
 Foreclosure Percentage
 by
 Census Tract/
 Block Groups



- Census Tract
- Block Group
- City Boundary

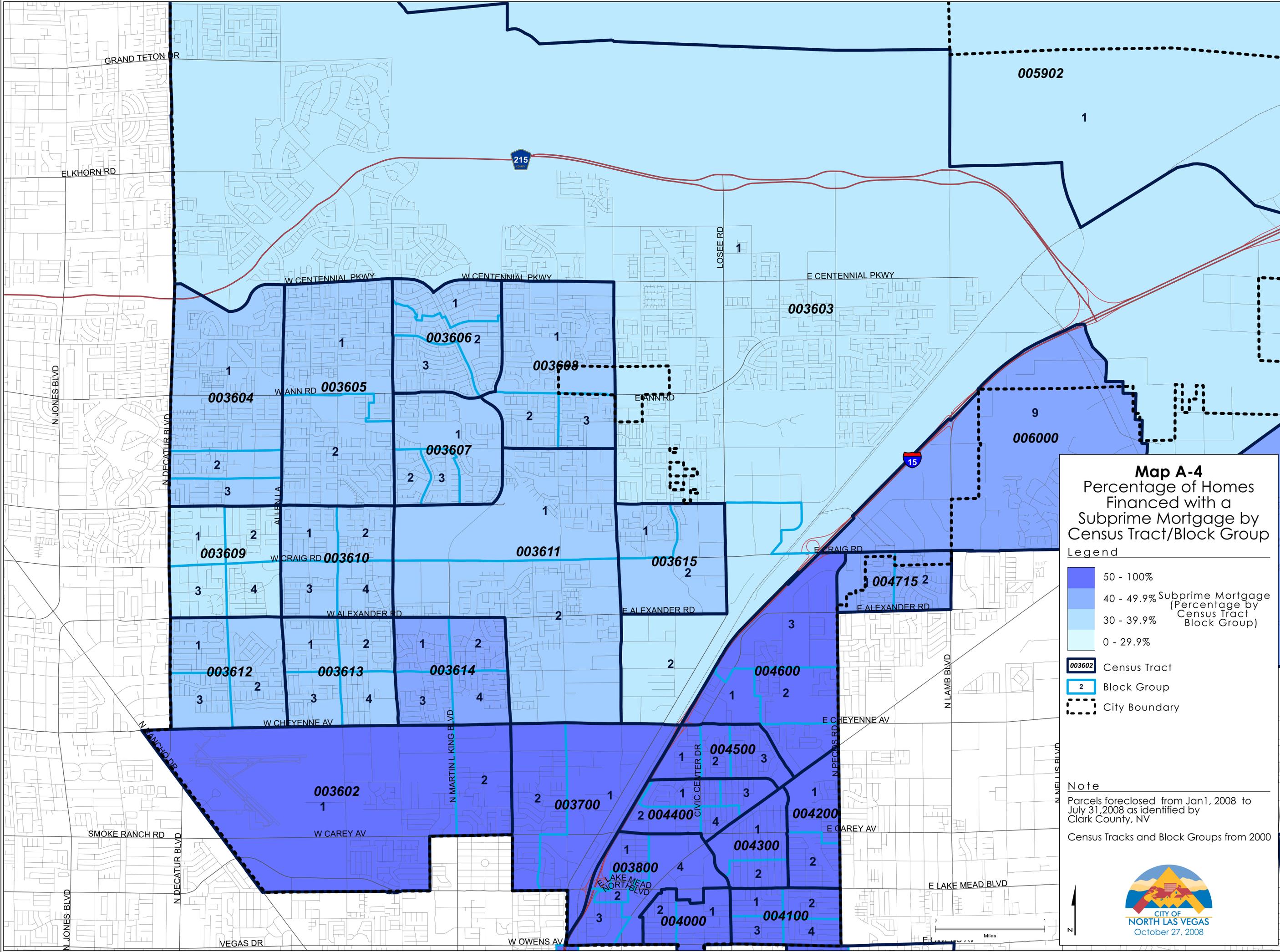
Note

Parcels foreclosed from Jan 1, 2008 to July 31, 2008 as identified by Clark County, NV

Census Tracts and Block Groups from 2000



Miles



Map A-4
 Percentage of Homes
 Financed with a
 Subprime Mortgage by
 Census Tract/Block Group

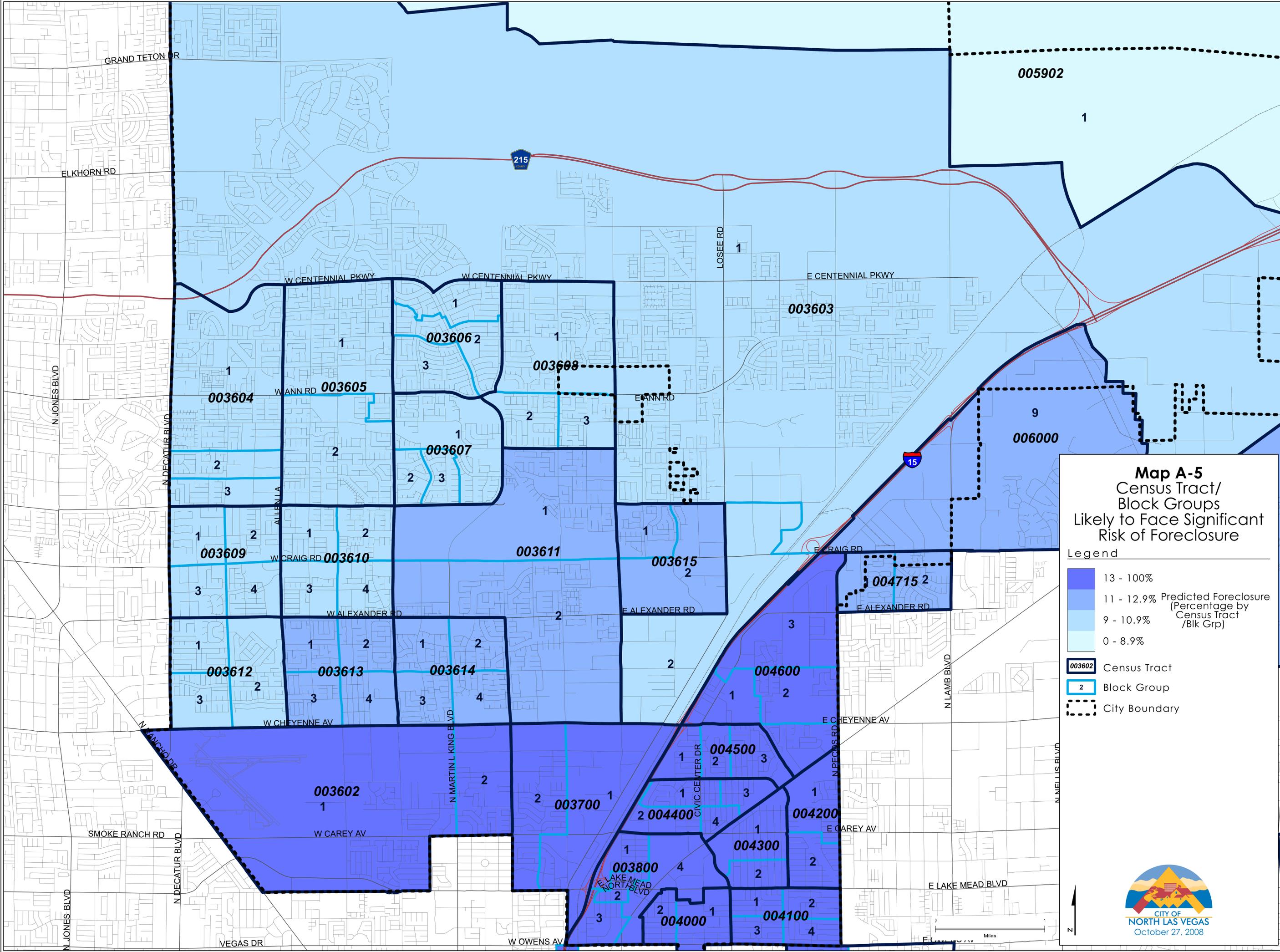
Legend

- 50 - 100%
- 40 - 49.9%
- 30 - 39.9%
- 0 - 29.9%

003602 Census Tract
2 Block Group
 City Boundary

Note
 Parcels foreclosed from Jan 1, 2008 to
 July 31, 2008 as identified by
 Clark County, NV
 Census Tracts and Block Groups from 2000



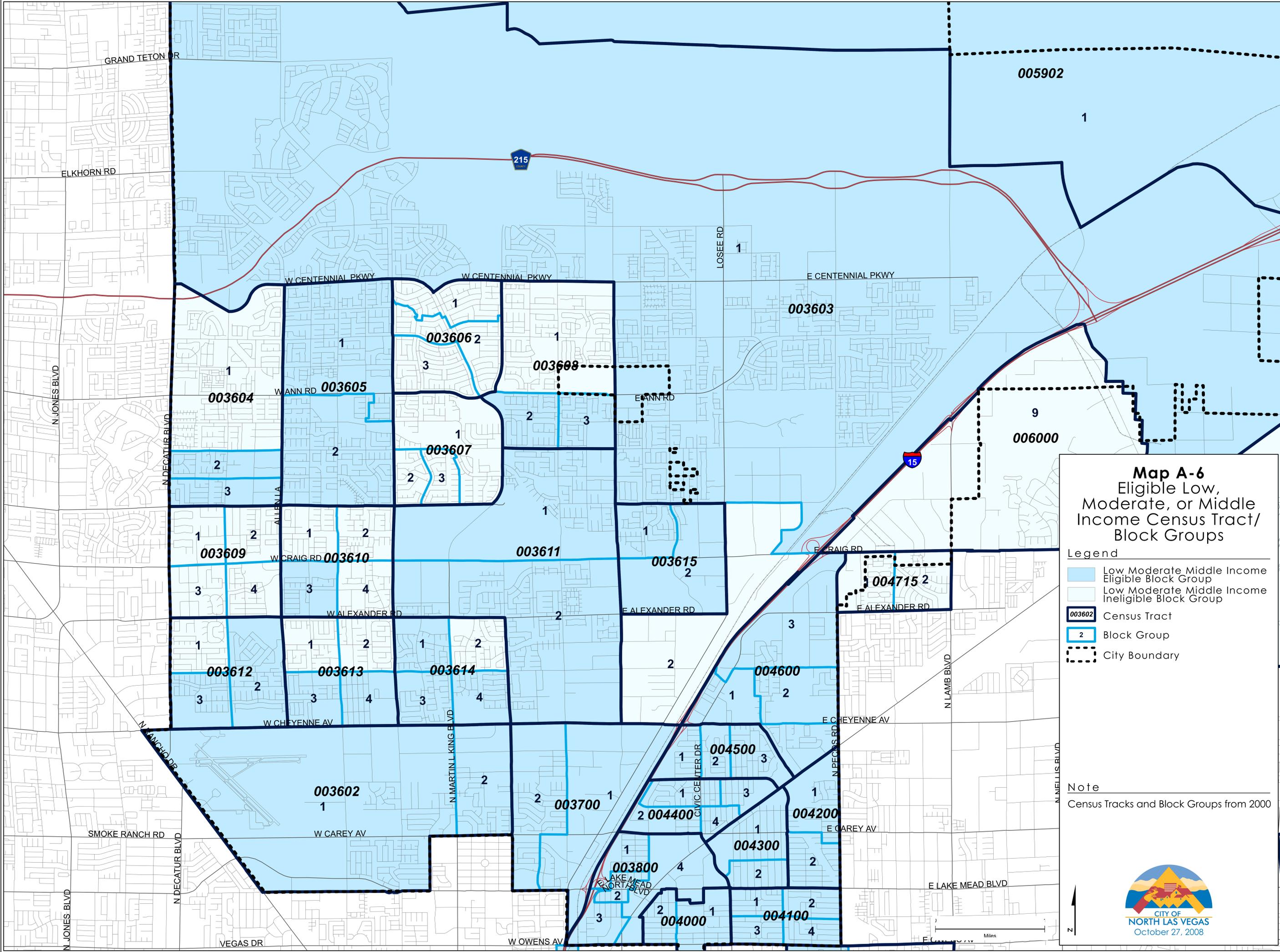


Map A-5 Census Tract/ Block Groups Likely to Face Significant Risk of Foreclosure

- Legend
- 13 - 100%
 - 11 - 12.9%
 - 9 - 10.9%
 - 0 - 8.9%
- 003602 Census Tract
2 Block Group
 City Boundary



Scale: 0 to 1 Miles



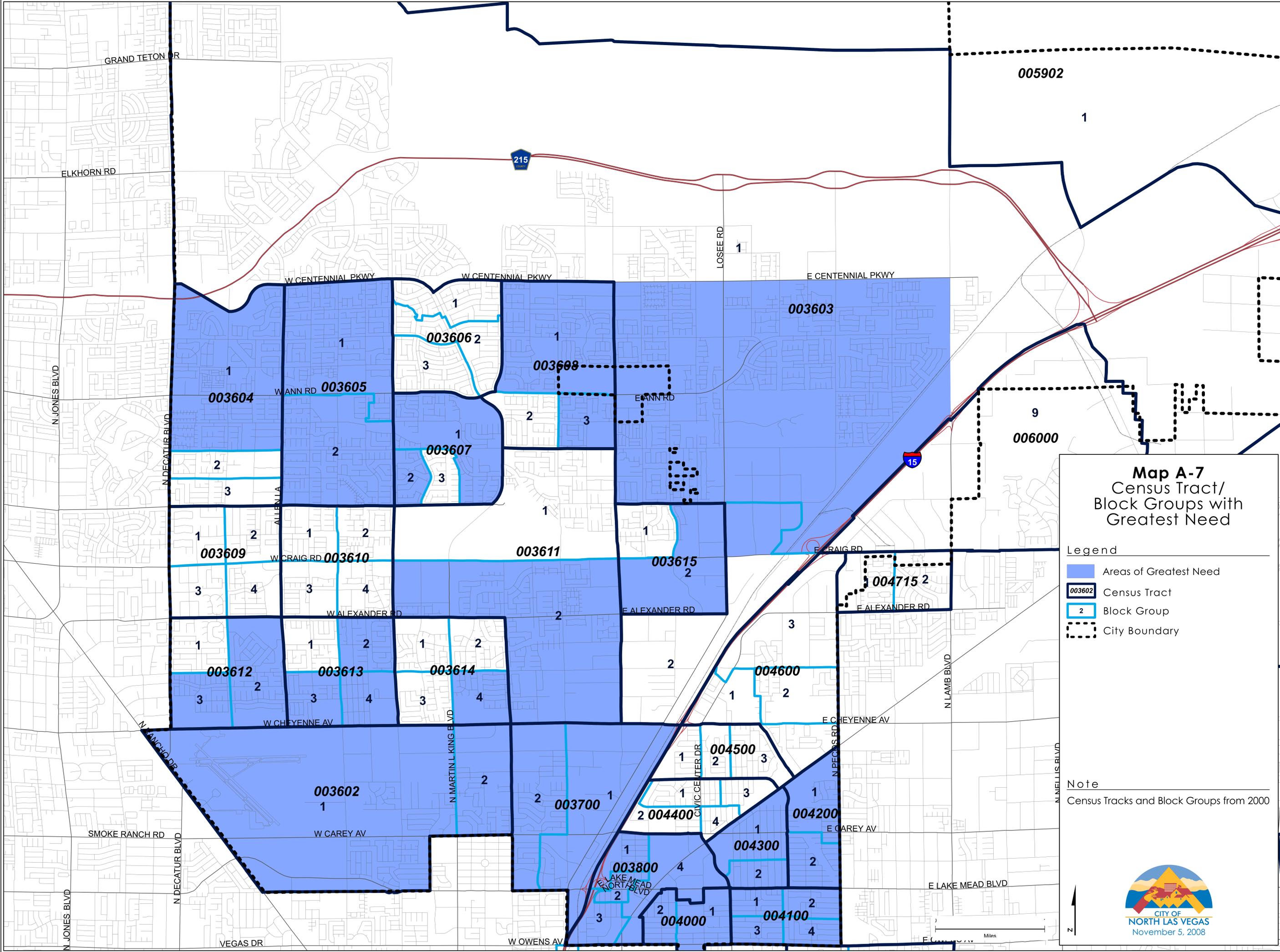
Map A-6 Eligible Low, Moderate, or Middle Income Census Tract/Block Groups

- Legend**
- Low Moderate Middle Income Eligible Block Group
 - Low Moderate Middle Income Ineligible Block Group
 - 003602 Census Tract
 - 2 Block Group
 - City Boundary

Note
Census Tracts and Block Groups from 2000



Miles



Map A-7 Census Tract/ Block Groups with Greatest Need

- Legend**
- Areas of Greatest Need
 - Census Tract
 - Block Group
 - City Boundary

Note
Census Tracts and Block Groups from 2000

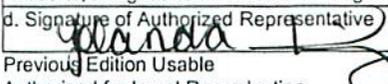


Scale: 0 to 1 Miles

**APPLICATION FOR
FEDERAL ASSISTANCE**

OMB Approved No. 3076-0006

Version 7/03

1. TYPE OF SUBMISSION: Application <input checked="" type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		2. DATE SUBMITTED 12/1/08	Applicant Identifier
<input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		3. DATE RECEIVED BY STATE	State Application Identifier
		4. DATE RECEIVED BY FEDERAL AGENCY 12/1/08	Federal Identifier
5. APPLICANT INFORMATION			
Legal Name: County of Clark, Nevada		Organizational Unit: Department: Finance Department	
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: Michael
County: Clark		Middle Name J.	
State: NV		Last Name Pawlak	
Zip Code 89155-1212		Suffix:	
Country: USA		Email: mjp@co.clark.nv.us	
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 88-6000002		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.)		7. TYPE OF APPLICANT: (See back of form for Application Types) County Other (specify)	
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: TITLE (Name of Program): Labor Management Cooperation Program		9. NAME OF FEDERAL AGENCY: U.S. Department of Housing and Urban Development	
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): Clark County and the City of North Las Vegas		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Neighborhood Stabilization Program	
13. PROPOSED PROJECT Start Date: 12/1/08		14. CONGRESSIONAL DISTRICTS OF: a. Applicant 1st and 2nd	
Ending Date: June 30, 2013		b. Project 1st and 2nd	
15. ESTIMATED FUNDING:		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?	
a. Federal	\$ 29,666,798 ⁰⁰	a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE:	
b. Applicant	\$ ⁰⁰	b. No. <input checked="" type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372	
c. State	\$ 9,871,040 ⁰⁰	<input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW	
d. Local	\$ ⁰⁰	17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?	
e. Other	\$ ⁰⁰	<input type="checkbox"/> Yes If "Yes" attach an explanation. <input checked="" type="checkbox"/> No	
f. Program Income	\$ 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.	
g. TOTAL	\$ 39,537,838 ⁰⁰		
a. Authorized Representative			
Prefix	First Name Yolanda	Middle Name T.	
Last Name King			Suffix
b. Title Director, Budget and Financial Planning		c. Telephone Number (give area code) 702-455-5025	
d. Signature of Authorized Representative 		e. Date Signed 11/18/08	

Previous Edition Usable
Authorized for Local Reproduction

Standard Form 424 (Rev.9-2003)
Prescribed by OMB Circular A-102

CERTIFICATIONS

- (1) **Affirmatively furthering fair housing.** The jurisdiction will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-lobbying.** The jurisdiction will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (3) **Authority of Jurisdiction.** The jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (4) **Consistency with Plan.** The housing activities to be undertaken with NSP funds are consistent with its consolidated plan, which means that NSP funds will be used to meet the congressionally identified needs of abandoned and foreclosed homes in the targeted area set forth in the grantee's substantial amendment.
- (5) **Acquisition and relocation.** The jurisdiction will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the Notice for the NSP program published by HUD.
- (6) **Section 3.** The jurisdiction will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (7) **Citizen Participation.** The jurisdiction is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (8) **Following Plan.** The jurisdiction is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.
- (9) **Use of funds in 18 months.** The jurisdiction will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008 by using, as defined in the NSP Notice, all of its grant funds within 18 months of receipt of the grant.
- (10) **Use NSP funds \leq 120 of AMI.** The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.
- (11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by

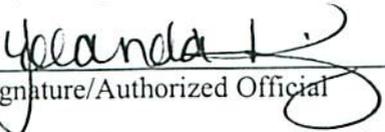
assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the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

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

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

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

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



Signature/Authorized Official

11/13/08
Date

Manager, Budget and Financial Planning
Title

Public Notice
Proposed Resubmission of an Amendment to
FY 2008 Annual Action Plan and FY 2005-2009 Consolidated Plan
Neighborhood Stabilization Program (NSP)

The Clark County and City of North Las Vegas Proposed Resubmission of the Neighborhood Stabilization Program (NSP), a substantial amendment to the FY 2008 Annual Action Plan, is now available. The NSP Amendment will allow Clark County and North Las Vegas to use NSP funds for the purchase and redevelopment of abandoned and foreclosed homes and residential properties. The resubmission includes changes made to the Amendment that was submitted to the U.S. Department of Housing and Urban Development on Dec. 1, 2008. The Buena Vista Springs Redevelopment project was deemed an ineligible activity by HUD as it did not meet the definition for "foreclosed". Both Clark County and North Las Vegas had allocated funding to this proposed project which has now been reallocated to other activities as outlined below.

Clark County is proposing to use Federal and State NSP funds in targeted areas for the following activities:

NSP Homebuyer Assistance Program	\$6,800,000
NSP Purchase and Rehabilitation of Single-Family Housing	\$9,257,454
NSP Housing Counseling	\$400,000
NSP Acquisition and Rehabilitation for Rental Housing	\$11,090,993
Demolition	\$75,000
Redevelopment	\$420,000
Administration	\$2,842,399
TOTAL	\$30,885,846

North Las Vegas is proposing to use Federal and State NSP funds in targeted areas for the following activities:

NSP Acquisition and Rehabilitation for Rental Housing	\$2,293,957
NSP Purchase and Rehabilitation of Single-Family Housing	\$2,349,766
Down Payment Assistance Program	\$3,000,000
Housing Counseling	\$125,000
Redevelopment of 3 Properties in North Valley	\$105,750
Administration	\$777,519
TOTAL	\$8,651,992

Clark County will receive \$22,829,062 in Federal NSP funds and North Las Vegas will receive \$6,837,736. The State of Nevada will also allocate NSP funding to Clark County in the amount of \$8,056,784 and North Las Vegas in the amount of \$1,814,256. The NSP Amendment Resubmission must be submitted to HUD by February 12, 2009 for re-review and approval. If you would like to receive a copy of the Draft NSP Amendment, please visit the Clark County website at

<http://www.accessclarkcounty.com/depts/Finance/crm/Pages/CommunityResourcesManagementDivision.aspx>

or contact Clark County Community Resources Management at 455-5025.

All comments on the NSP Amendment must be submitted in writing no later than 4:00 p.m. on February 1, 2009 to:

Kristin Cooper
Clark County Community Resources Mgmt.
P.O. Box 551212
500 South Grand Central Parkway - 5th Floor
Las Vegas, NV 89155-1212

PUB: January 16, 2009 LV Review-Journal

AFFP DISTRICT COURT
Clark County, Nevada

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA)
COUNTY OF CLARK) SS:

STACEY M. LEWIS, being 1st duly sworn, deposes and says: That she is the Legal Clerk for the Las Vegas Review-Journal and the Las Vegas Sun, daily newspapers regularly issued, published and circulated in the City of Las Vegas, County of Clark, State of Nevada, and that the advertisement, a true copy attached for,

CC COMMUNITY RES 4555025CC 4682099

was continuously published in said Las Vegas Review-Journal and / or Las Vegas Sun in 1 edition(s) of said newspaper issued from 11/09/2008 to 11/09/2008, on the following days:

11/09/2008

Public Notice
Proposed Amendment to FY 2008 Annual Action Plan and
FY 2005-2009 Consolidated Plan
Neighborhood Stabilization Program (NSP)

The Clark County and City of North Las Vegas Proposed Neighborhood Stabilization Program, a substantial amendment to the FY 2008 Annual Action Plan, is now available.

Clark County will receive \$22,829,062 in Federal NSP funds and North Las Vegas will receive \$6,837,736. The State of Nevada will also allocate NSP funding to Clark County in the amount of \$8,056,784 and North Las Vegas in the amount of \$1,814,256.

The NSP Amendment will allow Clark County and North Las Vegas to use NSP funds for the purchase and redevelopment of abandoned and foreclosed homes and residential properties.

Clark County is proposing to use Federal and State NSP funds in targeted areas for the following activities:

NSP Homebuyer Assistance Program	\$6,800,000
NSP Purchase and Rehabilitation of Single-Family Housing	\$9,257,454
NSP Housing Counseling	\$400,000
NSP Acquisition and Rehabilitation for Rental Housing	\$8,090,993
Demolition	\$75,000
Redevelopment	\$420,000
Buena Vista Springs Redevelopment	\$3,000,000
Administration	\$2,842,399
TOTAL	\$30,885,846

North Las Vegas is proposing to use Federal and State NSP funds in targeted areas for the following activities:

Buena Vista Springs (Lake Mead/Comstock)	\$1,586,181
Neighborhood Housing Services 3 Bedroom Rental Property Purchases	\$504,000
Soft Costs for vacant Habitat for Humanity Properties in North Valley	\$105,750
Down Payment Assistance Program	\$3,000,000
Buena Vista Springs (Carey/Morton) or Desert Mesa Acquisition	\$3,037,789
Administration	\$418,272
TOTAL	\$8,651,992

The NSP Amendment must be submitted to the U.S. Department of Housing and Urban Development by Dec. 1, 2008 for review and approval. If you would like to receive a copy of the Draft NSP Amendment, please visit the Clark County website at <http://www.accessclarkcounty.com/depts/Finance/crm/Pages/CommunityResourcesManagementDivision.aspx>

or contact Clark County Community Resources Management at 455-5025.

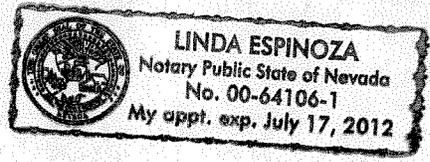
All comments on the NSP Amendment must be submitted in writing no later than 4:00 p.m. on November 23, 2008 to:

Kristin Cooper
Clark County Community Resources Mgmt.
P.O. Box 551212, 500 South Grand Central Parkway - 5th Floor, Las Vegas, NV 89155-1212
PUB: November 9, 2008 LV Review-Journal

Signed: Stacey M. Lewis

SUBSCRIBED AND SWORN BEFORE ME THIS, THE
11th day of November, 2008.

Linda Espinoza
Notary Public



CLARK COUNTY AND NORTH LAS VEGAS PUBLIC COMMENTS AND RESPONSES

Following is a summary of public comments received on the original NSP Amendment. Comments received via email are included in total in this section. Comments received on comment forms or in letters are summarized and the form or letter are attached for reference. No additional comments were received during the second public comment period on the revised NSP Amendment.

Comments from Michele Johnson, President/CEO of Consumer Credit Counseling Service – received via email:

Participation with any agency or community partner to provide homebuyer education programs through the Neighborhood Stabilization Program should ensure the agency or community partner is:

- 1) HUD approved as a comprehensive housing counseling agency, preferably as a Local Housing Counseling Agency, as criteria and oversight is much stricter than for organizations approved through a national HUD intermediary.
- 2) Ensure any nonprofit agency or community partner providing service of any type through the Neighborhood Stabilization Program be financially solvent, as all services will be provided on a reimbursable basis. An agency or community partner not in the position to provide services from reserves while awaiting reimbursement may jeopardize the Neighborhood Stabilization Program. This is easily accomplished through accessing a nonprofit agency or community partner's 990 tax return (a public document) or by requesting audited financials, which all nonprofit or community partners should have to ensure adequate financial oversight.

To ensure that there is quality delivery of counseling and education services to the residents of Clark County by unbiased neutral housing counselors and educators, all such personnel shall obtain and maintain a Certified Housing Counselor designation, with such certification obtained by an accredited independent third party.

Any and all projects associated with the Neighborhood Stabilization Program that include participation with any separate nonprofit agency or community partner needs, or must, be put out to bid.

Response:

The Neighborhood Stabilization Program implementation regulations specifically state that “the grantee must require each NSP assisted homebuyer to receive and complete at least 8 hours of homebuyer counseling from a HUD-approved housing counseling agency before obtaining a mortgage loan.” Clark County and North Las Vegas will ensure that any agency chosen through the Request for Proposal/Request for Qualifications to undertake housing counseling is a HUD-approved housing counseling agency. Additionally, as part of the RFP/RFQ process, Clark County and North Las Vegas will

conduct the due diligence necessary to ascertain the financial stability of any organization requesting to participate in NSP programs.

Community Development Block Grant and Neighborhood Stabilization Program regulations do not require government jurisdictions to adhere to federal procurement requirements when conveying real property to a non-profit agency. However, when a government jurisdiction elects to hire a contractor, whether to administer a program, complete a task or do construction, those contractors must be procured competitively per federal regulation.

Comments from Dawn Lane of the Hope Home Foundation and Pro Realty Group – received via NSP Community Partners Meeting Comment Sheet (attached):

This would be the perfect time to implement employer assisted housing programs. The cities should look to business leader who employ our workforce and help them house our workforce thru these grant opportunities.

Response:

Clark County and North Las Vegas have not precluded working with Employer Assisted Housing programs using NSP funding. Through the RFP/RFQ process, non-profit organizations will have the opportunity to submit proposals that may include Employer Assisted Housing programs. We also believe that assisting working families to become homeowners can and will help to stabilize our neighborhoods.

Comments from BJ Wright, Executive Director of Neighborhood Housing Services of Southern Nevada –received via NSP Community Partners Meeting Comment Sheet (attached):

The jurisdictions should increase the dollars allocated to the nonprofit agencies providing housing counseling services and down payment administration. These are both very time intensive activities, which should not be rushed. I would highly recommend all municipalities review this line item and increase the allocation for the services.

Response:

Clark County and North Las Vegas may make adjustments to the housing counseling funding amounts should it become apparent that additional funds are needed for this activity.

Comments from Gaylord Pearson – received via email:

Below is a short outline on ideas for using HUD money.

1. Most important idea - keep homes small.
Reasons: lower taxes, utilities, insurance, upkeep.

2. Replacing homes on individual lots use modular homes.
Example size & type:
 - A. Homes should be 900-1000 sq. ft.
 - a. 2-bed, 2 bath
 - B. Houses should be Duplex's or large if lot is zoned for it
 - C. 2 person houses 500 sq. ft. --1 bed 1 bath--Duplex or larger

3. For Shannon West - homeless housing
 - A. Buy land for 80-unit trailer park. Use trailer houses & modular homes, 320 sq. ft to 600 sq. ft, need 12-15 acres.

BIG QUESTION--will HUD approve small trailer houses?

4. GET LAND for future development of housing for low-income people.

Response:

These funds may be used for the redevelopment of homes when a house is demolished. In those cases, the size of the replacement home will be appropriate to the lot size and in keeping with the character of the existing neighborhood. Modular homes may be considered should this be appropriate for the area in which they would be located.

Using modular or trailer homes to house the homeless has not been proposed by any of the non-profit agencies that generally participate in HUD funded programs but it is not a prohibited activity.

Clark County has set-aside over 1,000 undeveloped acres under the Southern Nevada Public Lands Management Act for the future development of affordable and workforce housing. Currently, two such multifamily rental developments are under construction.

Comments from Geraldine Lewis, Robert Spenser, and Wanda Burch, members of the North Valley Community located in North Las Vegas, Nevada – received via email:

Our voices regarding the Neighborhood Stabilization Plan (NSP). Please help the North Valley Community of North Las Vegas, Nevada to beautify and stabilize our area by demolishing the vacant Housing Apartments on the North East Corner of Carey Ave. and West Bl, and the Housing Apartments on the North West Corner of West Lake Mead Bl and Comstock Drive.

Response:

The City of North Las Vegas intends to use a portion of the NSP funds to acquire the two Buena Vista Springs (BVS) sites that are described in the comment above. HUD closed these apartment complexes for unsafe conditions, after the cancellation of their HAP contract, in late 2007. Both sites are currently in foreclosure (the Notice of Breach and

Election to Sell was recorded September 8, 2008) and have been vacant (with the exception of the tax credit and senior units) since December 2007.

Comment from Stephanie C. Buckley, Regional Director for United States Veterans Initiative – received via letter (attached):

U.S. VETS has reviewed the Clark County' NSP Substantial Amendment and is concerned that the proposal does not target the growing housing needs of veterans, including homeless veterans and other low-income veterans in Clark County, and especially those needing workforce housing as well as clean and sober permanent supportive housing options. U.S. VETS specifically proposes amending the plan to commit 1.5 million to their organization for the acquisition and rehabilitation of properties for rental housing for veterans.

Response:

Clark County recognizes that there are many different groups that make up the homeless and low-income population, and that they have a variety of needs. However at this time, we are not targeting a specific homeless population to receive this funding. Under Activity 4 in the Clark County NSP Amendment, Clark County has set aside over \$8 million to assist the Clark County Housing Authority and other nonprofits to purchase and rehabilitate foreclosed or abandoned properties for rental to households below 50% of area median income. Those organizations that can demonstrate the financial and organizational capacity to undertake these activities may be awarded NSP funding through an RFP process. U.S. VETS is welcome to submit a proposal to Clark County at that time.



UNITED STATES VETERANS INITIATIVE
"SERVING THOSE WHO SERVED"

BOARD OF DIRECTORS

November 16, 2008

Robert Price,
Chairman
Greg Green,
Vice Chairman
Allen Ralston,
Secretary
Keith Ellis,
Treasurer
Col. Joseph Smith,
Chairman Emeritus
Michael Dolphin
David Farrar
Robert Jordan
Maurice Kane
Linda Miles-Celistan
William Nash
Maj. Adam Siegler

Clark County
CDBG Division
500 South Grand Central Parkway 5th Floor
Las Vegas, NV 89106
Attn: Kristen R. Cooper

Re: Neighborhood Stabilization Program -- Comments to Draft Substantial Amendment

Dear Ms. Cooper:

U.S.VETS has reviewed the Clark County's NSP Substantial Amendment and is concerned that the proposal does not target the growing housing needs of veterans, including homeless veterans and other low-income veterans in Clark County, and especially those needing workforce housing as well as clean and sober permanent supportive housing options. Approximately 167,995 veterans live in Clark County, many low-income and very low-income. Particularly now with the growing number of veterans returning from Iraq and Afghanistan (OEF/OIF), it is critical to recognize the need for veterans housing. At U.S.VETS, we are experienced providers of a wide array of housing options to veterans across the United States, including our facilities in Clark County.

PRESIDENT & CEO

Dwight Radcliff

The New York Times reported this week: "Congress recently asked the Veterans Affairs Department to find out how badly veterans were being affected, particularly by foreclosures. The Army, too, began tracking requests for help on foreclosure issues for the first time. Service organizations report that requests for help from military personnel and new veterans, especially those who were wounded, mentally or physically, and are struggling to keep their houses and pay their bills, has jumped sharply." (See "Newest Veterans Hit Hard by Economic Crisis", New York Times, November 18, 2008) Serious injuries, unemployment and delays in disability claims make these difficult economic times particularly challenging for veterans. Hundreds of thousands of veterans live in the Clark County, many low-income and very low-income. Particularly now with the growing number of veterans returning from Iraq and Afghanistan (OEF/OIF), it is critical to recognize the need for veterans housing. At U.S.VETS, we are experienced providers of a wide array of housing options to veterans across the United States, including our facilities in Las Vegas.

U.S.VETS specifically proposes amending the NSP Substantial Amendment to commit \$1,500,000 of the funds provided under Activity 4, NSP Acquisition and Rehabilitation for Rental Housing, to U.S.VETS for the purchase and rehabilitation of abandoned, condemned and/or foreclosed homes for rent to low-income veterans, both single adults and veterans with families. (The total amount allocated to Activity 4 is \$8,090,993.) Recognizing the number of veterans residing in Clark County, NSP funds for affordable rental housing should be targeted to low-income veterans and their families. U.S.VETS



UNITED STATES VETERANS INITIATIVE
"SERVING THOSE WHO SERVED"

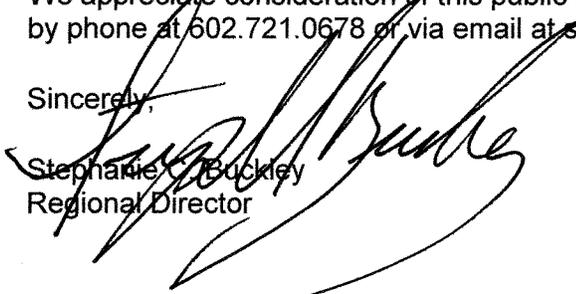
is an ideal partner in this capacity. U.S.VETS's expertise could significantly impact the effectiveness of this rental program.

While we recognize and commend the efforts of the Clark County to design an efficient program for the use of the NSP funds, U.S.VETS strongly encourages the City to include in the Substantial Amendment a commitment to veterans housing. U.S.VETS is making similar requests to a handful of NSP funds recipients in the cities and counties where significant numbers of veterans reside. HUD has approved a preference for veterans in their NSP funds Q&A. See

<http://www.hud.gov/offices/cpd/communitydevelopment/programs/neighborhoodspg/nsfaq.cfm>. We greatly appreciate the State of Nevada's previous support and collaboration in our efforts to assist veterans in their road to independence. As veterans return from Iraq and Afghanistan, we look forward to working with the Clark County to find every opportunity to support our veterans.

We appreciate consideration of this public comment. I am available at your convenience by phone at 602.721.0678 or via email at sbuckley@usvetsinc.org.

Sincerely,


Stephanie C. Buckley
Regional Director

Neighborhood Stabilization Program Community Partners Meeting

Monday, November 17, 2008

2:00 p.m. to 5:00 p.m.

Comment Sheet

Name: BT Wright

Agency: Neighborhood Hsg Services of SN

Direct Comments to Following Jurisdictions (please check all that apply):

- Clark County
- City of Las Vegas
- City of North Las Vegas
- City of Henderson

Comments: First of all, I commend you for
all your hard work in putting these
plans together in such a short time
frame.

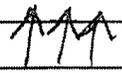
I'm sure there will need to be adjustments
along the way - there always are
but you have to move forward with
the plans you have.

My only comment after a brief review
is to increase the dollars allocated
to the non profit agencies providing
housing counseling services / and down
payment administration. These are both
very time intensive activities which should

not be pushed. In fact, housing counseling should be the bed rock on which all other programs ~~should be~~ are founded.

If the families facing foreclosure now and those who have already lost their homes had gone through the Home Buyer Education and 1:1 counseling, many of the problems we are experiencing now would be substantially reduced. These families would have understood the lending / real estate process and made much better decisions.

Housing Counseling and Workshops are a critical component of this plan.

I would highly recommend all municipalities review this line item and ~~the~~ increase the allocation for these services. 

Sharyn

Neighborhood Stabilization Program Community Partners Meeting

Monday, November 17, 2008

2:00 p.m. to 5:00 p.m.

Comment Sheet

Name: DAWN LANE dawn@prorealtynevada.com

Agency: HOPE HOME FOUNDATION / PRO REALTY GROUP

Direct Comments to Following Jurisdictions (please check all that apply):

- Clark County
 City of Las Vegas
 City of North Las Vegas
 City of Henderson

THANKS FOR THE INFO.

Comments: THIS WOULD BE THE PERFECT TIME TO IMPLEMENT EMPLOYER ASSISTED HOUSING PROGRAMS. THE CITIES SHOULD LOOK TO BUSINESS LEADERS WHO EMPLOY OUR WORKFORCE AND HELP THEM HOUSE OUR WORKFORCE THRU THESE GRANT OPPORTUNITIES. WE HAVE PROGRAMS IN PLACE AS I AM SURE I HAVE PRESENTED HOME FROM WORK TO YOU ALL.

WE ARE HAPPY TO COORDINATE, MARKET AND HELP WITH OUR SERVICES IN ANY WAY THRU EDUCATION AND OR REAL ESTATE, TITLE OR LENDING SERVICES. I THINK THAT BY INVOLVING BUSINESSES AND WORKFORCE FAMILIES WE WILL ALSO INCREASE TAX BASE, SOLVE THE VACANT

FORECLOSURE PROBLEM, SPUR ECONOMIC
GROWTH AND USE THIS GRANT MONEY
TO IMPROVE NEIGHBORHOODS AND
THE QUALITY OF LIFE.