



February 15, 2023

Planning Commission  
City of Las Vegas  
Department of Planning  
333 N. Rancho Drive  
Las Vegas, NV 89106  
702-229-6301

RE: The Golden Rule Senior Apartments Phase II  
820 N. Eastern Avenue  
Las Vegas, NV 89101  
Justification Letter

Dear Planning Commission,

On behalf of Neighborhood Housing Services of Southern Nevada, Inc. I am pleased to submit this justification letter for The Golden Rule Senior Apartments Phase II as part of our Application package. Please find below the project requests for a General Plan Amendment and a Waiver of Residential Adjacency followed by a project description:

**Project Requests for General Plan Amendment and Waiver of Residential Adjacency**

The Golden Rule Senior Apartments Phase II is requesting a General Plan amendment to the Phase I submittal to address two items:

- We are requesting the deferral of Phase I landscaping work in the courtyard to Phase II of the project. This will minimize disruption to residents of Phase I once construction on Phase II begins.
- We are requesting a change in the site's General Plan Designation from Medium M (25.49 units/acre) to High H (>25.5 units/acre). The current M designation allows 79 units on the site. Phase I and II each provide for 60 units, for a total of 120 units on the site. Changing the designation to H would allow us to build the additional 41 units proposed for Phase II.

The Golden Rule Senior Apartments Phase II is requesting a Site Development Plan Review for a Waiver of Residential Adjacency:

- Phase II exceeds the currently allowable height for buildings adjacent to the R-1 properties north of the project site by 18'-2". This project is 100% low-income housing and will provide affordable housing opportunities for an underserved population in the City of Las Vegas.

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believe that City Council will support this waiver for Phase II in order to provide additional affordable housing units to its residents.

### **Project Description – Request and Intended Use of Property**

The Golden Rule Apartments Phase II is a proposed new construction, 60-unit affordable senior supportive housing development to be located in northeast Las Vegas. It is directly adjacent to The Golden Rule Apartments Phase I, a 60-unit mixed-income senior supportive housing development which is slated to open in April 2023. The development will include the physical spaces and social supports to allow very- and extremely low- income seniors to age in place in a setting that promotes independence and dignity. The project is being developed by Neighborhood Housing Services of Southern Nevada (NHSSN), which is a non-profit organization that provides transitional housing, affordable rentals, educational workshops, and homeownership assistance with the goal of building better neighborhoods, block by block.

The three-story, new construction elevator residence will include 42 one-bedroom / one-bath (624 SF) and 18 two-bedroom / one-bath (847 SF), accessible/ adaptable apartments as well as community and service space. The common areas, which may be shared with Phase I, will include a multi-purpose room with warming kitchen, library/lounge, computer lab, exercise room, offices for management and supportive service staff, and secure and landscaped grounds, and courtyards. Outdoor areas will include resident and visitor parking, a barbecue and picnic area, dog park, and raised beds for resident gardening.

The Golden Rule Apartments Phase II will be a senior-restricted development available to residents aged 55 and above. All units will be affordable to seniors with incomes at or below 30%, 50%, and 60% of area median income (AMI). Approximately 17% of the units (10 units) will serve households below 30% of AMI. Thirty-one (31) of the units will serve households below 50% of AMI and nineteen (19) will serve households with incomes below 60% of AMI.

The project will employ a part-time Resident Service Coordinator who will assist residents in remaining financially and physically self-sufficient. The Coordinator will help residents access an extensive network of local services and work with providers to host on-site group workshops and information sessions. The Coordinator will also work with residents to plan on-site activities, holiday lunches, outings, and to develop a monthly newsletter.

### **Additional Information**

#### Number of employees/residents

The Golden Rule Senior Apartments Phase II will create approximately 150 temporary construction jobs and two permanent positions. The development will provide quality, affordable, mixed-income units to 60 households in the Las Vegas valley.

#### Hours of Operation

The proposed development is an independent living apartment complex. Hours of operation for on-site management will be determined prior to construction completion.

#### Existing similar uses owned or operation by the applicant and their location

Neighborhood Housing Services of Southern Nevada (NHSSN) is a non-profit organization established in 1992 to aid low-to-moderate income individuals and families by providing them with transitional housing, affordable rentals, educational workshops, and homeownership assistance. Through its multiple

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programs, NHSSN has helped households throughout Clark County turn their hopes for the American Dream into realities. Its vision is to build better neighborhoods, block by block.

NHSSN maintains 159 units of affordable rental housing, both single- and multi-family units throughout Clark County. All units are available to households with incomes at or below 80% of the Area Median Income (AMI). NHSSN also offers pre- and post-purchase housing counseling, down payment assistance programs, pre- and post-purchase education, and loan modification/loss mitigation counseling. It also acquires and rehabilitates single-family homes and sells them to low and moderate-income residents. Community members who purchase homes in this way are offered homeownership counseling and education. From 2012-to date, NHSSN assisted over 1800+ individuals and families in purchasing homes and provided homebuyer education to more than 8000+ Southern Nevada residents.

A list of NHSSN's existing properties and locations has been attached to this letter as Exhibit A.

Required state licenses specific to the use requested

There are no state licenses required for the use requested.

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## Sustainability

<i>Sustainability (if applicable, please explain)</i>	<i>Yes</i>	<i>No</i>
<p>Will this project be constructed to LEED or other equivalent standards?</p> <p>The Golden Rule Senior Apartments Phase II will meet or exceed Nevada Housing Division energy efficiency requirements.</p>	X	
<p>Will this project utilize alternative energy sources or water saving measures?</p> <p>The Golden Rule Senior Apartments Phase II will offset between 5.0% and 10.0% of projected electrical consumption through photovoltaic solar generation. It will also promote water conservation with low-flow fixtures and extensive xeriscaping.</p>	X	
<p>Is there connectivity to adjacent parcels?</p> <p>Will the proposed project qualify as a walkable community?</p> <p>The Golden Rule Senior Apartments Phase II is located within ½ mile of numerous community services and bus stops. ½ mile south of the property is a large shopping center containing a Walgreen's pharmacy, two grocery stores, a U.S. postal service office, a dental office, a hair salon, and several gas stations, retail stores, and eateries. There are also several places of worship within ½ mile. Less than a half-mile to the east is Gary Reese Freedom Park, which contains bocce courts, horseshoe pits, a fitness court, a jogging/walking path, playgrounds, picnic areas, a pool, a disc golf field, and several sport courts and fields. The Las Vegas Fire and Rescue Department Station 8 is located adjacent to the park, providing residents with quick emergency responses when necessary.</p> <p>There are also several bus stops within ½ mile of the property. RTC Southern NV Route 110 runs south to north along Eastern Avenue from Paradise Valley to North Las Vegas, and Route 208 runs west to east along Washington through downtown Las Vegas to Durango Drive.</p>	X	X
<p>Is the project using any means of sustainable construction?</p> <p>Buildings are oriented to maximize northern and southern sun exposure and windows have trellises to control sunlight exposure on the north, west, and south elevations. The exterior color scheme is mostly white to minimize heat absorption, and roof overhangs help control sunlight entering the buildings. The projects will also utilize photovoltaic solar generation as noted above. It will also promote sustainable building techniques through the use of low- and no-VOC paints, carpeting, padding, and adhesives, and formaldehyde-free particleboard. It will promote water conservation with low-flow fixtures and extensive xeriscaping.</p>	X	
<p>Will this project meet the intent of the Urban Forestry Initiatives?</p> <p>The project will be built per City of Las Vegas codes and will therefore meet the intent of the Urban Forestry Initiative. There are no landscape waivers anticipated.</p>	X	
<p>Will the project provide any bicycle parking?</p>		

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Indoor secured bicycle storage was provided with Phase I to cover both Phase I & II.		
Will the project provide any electric vehicle recharging stations?		X

## Findings

The Golden Rule Senior Apartments Phase II meets/supports existing City regulations in the following ways:

- The Golden Rule Senior Apartments Phase II development is located on an infill site located in the City of Las Vegas Redevelopment Area 1 and is consistent with the goals of preventing the spread of blight and strengthening the economic base of the Redevelopment Area.
- The site is currently zoned R-3: Medium Density Residential. The proposed development conforms to this zoning.
- The proposed development is compatible with adjacent developments and development in the area. It is directly adjacent to The Golden Rule Senior Apartments Phase I, a 60-unit affordable senior housing community. Surrounding uses include single-family residential housing to the north and west, Robert Lund Elementary School to the east, and Arthur McCants Manor senior apartments to the south.
- The development is consistent with the General Plan, the Design Standards Manual, the Land Buffer Standards, and other duly-adopted city plans, policies, and standards in the following ways:
  - Land Use:
    - LU-3 *Focus new development in infill and redevelopment areas.* The proposed project is located on undeveloped infill land.
    - LU-5 *Improve the quality of districts and neighborhoods to promote an authentic, vibrant sense of place.* The addition of senior affordable housing in the neighborhood will help solidify the residential character of the neighborhood.
  - Open Space and Recreation:
    - OS-5 *Prioritize increasing tree canopy across all areas of the City for multiple public health and environmental benefits.* The proposed landscaping will include all needed vegetation and shade trees to the site and street frontage.
  - Transportation and Infrastructure:
    - TI-1 *Support efficient water management, reduce water consumption and encourage a move towards a net zero water City.* The use of low flow water fixtures throughout the complex along with Xeriscape landscaping helps towards a net zero goal.
    - TI-3 *Prioritize the use of renewable energy sources.* The use of photovoltaic solar panels will assist in reducing the overall net consumption of electricity for the complex, which meets the City's goals for renewable energy.
    - TI-5 *Increase transportation choice and make transit options more convenient and better integrated with vibrant neighborhood and employment centers, better connecting people to their destinations.* As part of the Phase I development, the site has given up property on Eastern for the construction of a City transit stop. Senior residents will only have to walk to the curb to be able to connect to the City's Transit system.

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- Economy and Education:
  - EE-5 *Lead regional economic development through collaborative partnerships between state/local governments, education institutions, private sectors and philanthropic organizations in a way that results in equitable benefits.* Our complex is being developed through collaboration between the State of Nevada's Affordable Housing Tax Credit and Private Activity Bond programs, the State of Nevada's Home Means Nevada (HMN) initiative, and a local nonprofit developer who provides affordable housing to local residents. This collaborative effort aids the residents of Las Vegas's most vulnerable citizens.
  - EE-6 *Increase affordable housing types and choices for all income levels near existing and new employment centers.* The construction of 60 new senior affordable housing units meets these goals.
- Services and Facilities:
  - SF-1 *Provide equitable access to facilities and services that help meet residents' social needs, maximize their potential for development, and enhance community well-being.* The project will employ a part-time Service Coordinator who will help residents access an extensive network of local services and work with providers to host on-site group workshops and information sessions. The Coordinator will also work with residents to plan on-site activities, holiday lunches, outings, and to develop a monthly newsletter.
  - SF-2 *Reduce crime and create safe, walkable transit friendly communities that elevate social equity.* The project will have a transit stop located directly adjacent to the complex providing immediate access to the City's Transit system. A secured site perimeter will provide the first level of secure defense for residents. The secured parking lot allows residents the ability to park their vehicles giving them a more secure sense of place. As one enters the development, secure courtyards provide the next level of defensible space with the public interior spaces and their unit front door as the last level of defense. This layering of security should aid in providing a comfortable secure living environment for residents and their guests.
  - SF-3 *Prioritize the needs of the most vulnerable members of the community.* This project is for seniors who are living on fixed low incomes.
- Site access and circulation have been designed to limit the impact to adjacent roadways. The development will have a senior population and we do not anticipate an impact to neighborhood traffic.
- Building and landscape materials are appropriate for the area and for the City, with special consideration given to sustainability and water saving measures.
- Building elevations, design characteristics, and other architectural and aesthetic features are attractive, desirable in appearance, create an orderly and aesthetically pleasing environment, and are harmonious and compatible with developments in the area.
- The Phase II development requires a General Plan Amendment to change the General Plan Designation from medium to high density.
- The Phase II development requires a Waiver of Residential Adjacency to exceed the allowable building height for properties adjacent to R-1 Protected lots.
- No rezoning, Special Use permits, or variances are required as part of this request.

The development of this mixed-income senior apartment complex will fill a growing need for affordable senior housing and supportive elderly housing in the Las Vegas Valley. The City of Las Vegas 2020-2025 Consolidated Plan & Action Plan identifies 17,184 households with a senior resident that make 20%

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50% of the area median income. Over 21,500 renter households face a severe housing cost burden, spending more than 50% of their income on housing, and over 21,000 additional renter households spend more than 30% of their income on housing costs. While cost burden is a significant problem for households at 80% AMI and below, it is particularly difficult for those at 50% AMI and below, especially those on fixed incomes, which would include most elderly people and people with disabilities. The City's 2015-2020 Consolidated Plan stated that people over the age of 65 will make up over 20% of the population by 2035 (up from 12% in 2012).

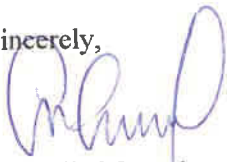
The proposed rents at The Golden Rule Phase II will be significantly below market rents in Las Vegas. The proposed 1-bedroom rents will range from \$460 to \$921 and the proposed 2-bedroom rents will range from \$552 to \$1,105 with owner paid utilities. For comparison, the Nevada Housing Division's "Taking Stock" report for 2021 identifies average market rents of \$1,335 for a one-bedroom unit and \$1,562 for a two-bedroom unit. The 2023 HUD Fair Market Rents for Clark County are \$1,212 for a 1-bedroom and \$1,457 for a 2-bedroom unit.

Financing for The Golden Rule Senior Apartments Phase II includes tax-exempt debt issued by the Nevada Housing Division (NHD), 4% Low-Income Housing Tax Credits, HOME funds from the City of Las Vegas, and conventional construction financing.

In addition, Neighborhood Housing Services of Southern Nevada, Inc. is a recipient of \$9 million in American Rescue Plan Act State and Local Fiscal Recovery Funds, also known as Home Means Nevada (HMN) funds. These funds are part of a unique, highly competitive statewide initiative to allocate \$500 million to affordable housing projects ranging from new development and preservation to rental assistance and homeownership programs.

With your support, we can provide high-quality affordable housing to very-low income seniors in the City of Las Vegas, please feel free to contact me, NHSSN's Executive Director/President, at 702-649-0998.

Sincerely,



Michelle Merced  
Executive Director/President

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