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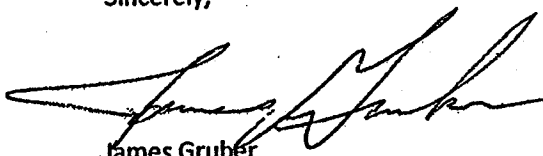
public and approved by HUD within the most current Five-Year Plan." Substantial amendment is defined as:

- a change in allocation priorities or a change in the method of distribution of funds; or*
- an activity not proposed in the most current Annual Action Plan; or*
- a change in the purpose, scope, location or intended beneficiaries of a specified program*

Since there has been no change in (1) allocation priorities, (2) the method of distribution of funds, (3) targeted activity, (4) purpose, (5) scope or (6) location, we do not believe the proposed expansion in targeted area constitutes a substantial amendment, and therefore, no public comment period is required. (Please note that this proposal has not been to change a location, but rather to allow the expansion of the targeted areas. These areas are over and above the minimum needs score of 12 and still within Canyon County).

Thank you very much for your continued guidance and we eagerly await your response so that we can move forward with NSP3 recipient awards.

Sincerely,



James Gruber
Grant Programs Manager

Cc: Julie Williams
Cc: Shelley Wallace
Cc: Karen Frings

Address	City	State	ZIP	NOD Date	Trustee's Sale Date	Date NCST Received from Seller	Days from NOD to Trustee's Sale	Days from Trustee's Sale to Foreclosure	Days from NOD to Foreclosure
503 W EMMA	COEUR D ALENE	ID	83814	9/2/2009	3/16/2010	5/25/2010	194	69	265
1211 E JEFFERSON ST	BOISE	ID	83712	5/18/2009	10/13/2009	7/28/2010	145	285	436
2660 S TRISTRAM WAY	MERIDIAN	ID	83642	7/28/2009	10/27/2009	8/5/2010	89	278	373
12720 WEST WOODVILLE STREET	BOISE	ID	83709	3/10/2010	6/28/2010	8/24/2010	108	56	164
3316 W TARGEE ST	BOISE	ID	83705	5/28/2009	8/28/2009	7/14/2010	90	316	406
3590 W VELA PLACE AND B	POST FALLS	ID	83854	5/13/2009	8/22/2009	7/14/2010	129	292	421

17502 E NORTH SHORE LN	BAYVIEW	ID	83803	6/17/2009	9/28/2009	7/14/2010	101	286	387
2106 W SAGE SPRINGS CT	MERIDIAN	ID	83642	2/25/2009	1/27/2010	7/14/2010	332	167	499
5934 N ALDER POINT PLACE	GARDEN CITY	ID	83714	8/13/2009	11/24/2009	7/14/2010	101	230	331
6347 S GOZZER RD	HARRISON	ID	83833	10/9/2009	1/12/2010	7/14/2010	93	182	275
4718 E UPPER HAYDEN LAKE RD	HAYDEN	ID	83835	9/12/2008	12/17/2008	7/28/2010	95	581	676

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US data on unemployment rate
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e Mortgage Bankers Association)

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et area (20% of REO in past

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nt addresses in the target area of
strategy with selected acquisition

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ble rental might be considered.

16.513100 43.599538

16.523743 43.556013

Blocks Comprising Target Neighborhood

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SP3 Planning Data

3707

antee as being the areas of greatest need must have an
or the grantee's identified target geography that is not less than
st needy score in an individual state. For example, if a state's
is 18, the requirement will be a minimum need of 17. If,
eedy census tract is 15, the requirement will be a minimum
identified in the Action Plan, HUD will average the
y the estimated number of housing units in each identified

n the last 90 days or "NoStat" can be a useful measure of
cancy problem. For urban neighborhoods, HUD has found that
nt addresses relative to the total addresses in an area to be a
serious blight problem.

ent things. In rural areas, it is an indicator of vacancy. However,
d but not ever used, it can indicate units under development,
t of the still flood damaged properties in New Orleans are
l to understand the target area identified.

from the US Census indicated above are usually close to the
ow. However, if the Census and USPS counts are substantially
are advised to use the information below with caution. For
for units never built, the USPS residential address count may
is a rural area largely served by PO boxes it may have fewer

d: 6799

/s (USPS, March 2010): 78

2010): 593

oreclosures are likely. That model estimates serious
s of foreclosures - subprime loans (HMDA Census Tract
asing unemployment (BLS data on unemployment rate
use price change). The predicted serious delinquency rate
reclosure starts (from the Mortgage Bankers Association)
Ups.

1 2004 and 2007: 2939

2 between 2004 and 2007: 23.3

3 nt or in foreclosure: 11.76

2009 to June 2010: 67

4 target areas for NSP 3 such that their dollars will have a
re have been over 1.9 million foreclosure completions in
5 estimated to only be able to address 100,000 to 120,000
6 focused investment.

7 impact in identified target area (20% of REO in past

8 e) percent fall in home value since peak value (Federal
9 June 2010): -24

10 nt rate June 2005: 3.74

11 nt rate June 2010: 10.82

12 nt Statistics

13 neighborhood targeting and to help inform the strategy

14 rsistently high unemployment? Serious consideration
15 homeownership strategy.

16 a where foreclosures are largely due to a combination of
17 it, and a relatively low vacancy rate? A down payment

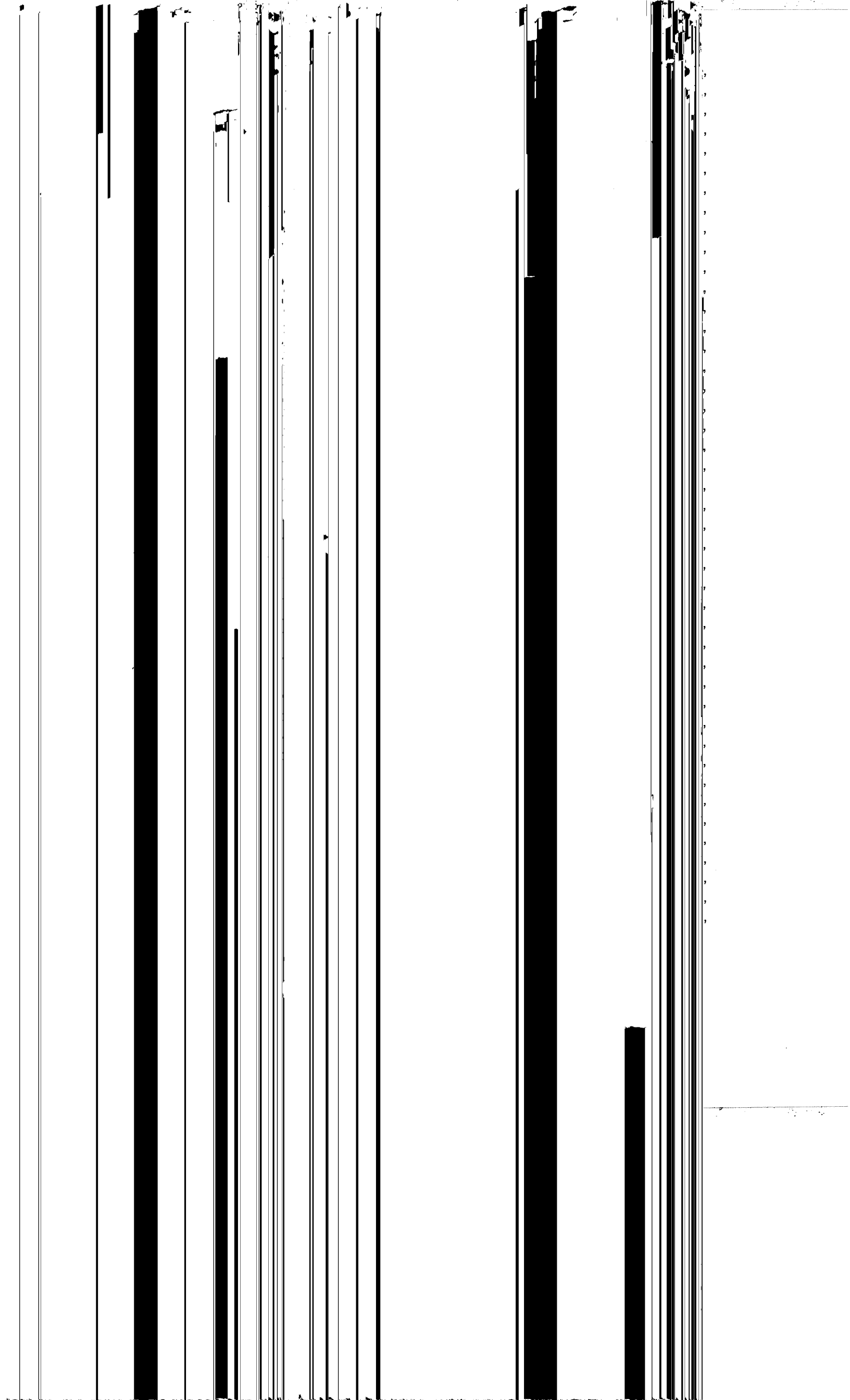
18 ber of substandard vacant addresses in the target area of
19 A demolition/land bank strategy with selected acquisition
20 red.

21 eted strategy of acquisition for homeownership and rental
22 onsidered.

23 rket historically have very high rents with low vacancies?
24 em as long-term affordable rental might be considered.

-116.693001 43.633093 -116.686821 43.633218 -116.687164 43.636324 -116.685791 43.637566
-116.683216 43.636572 -116.683044 43.635330 -116.679783 43.635205 -116.679440 43.633466
-116.582623 43.633963 -116.573181 43.633963 -116.573181 43.605008 -116.593266 43.604883
-116.593437 43.590463 -116.652832 43.590090 -116.653004 43.604635 -116.692829 43.604262

Blocks Comprising Target Neighborhood



P3 Planning Data

707

grantee as being the areas of greatest need must have an
the grantee's identified target geography that is not less than
the needy score in an individual state. For example, if a state's
score is 18, the requirement will be a minimum need of 17. If
the needy census tract is 15, the requirement will be a minimum
score identified in the Action Plan, HUD will average the
the estimated number of housing units in each identified

the last 90 days or "NoStat" can be a useful measure of
vacancy problem. For urban neighborhoods, HUD has found that
vacant addresses relative to the total addresses in an area to be a
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but not ever used, it can indicate units under development,
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score. However, if the Census and USPS counts are substantially
different, be advised to use the information below with caution. For
vacant or units never built, the USPS residential address count may
be lower. In a rural area largely served by PO boxes it may have fewer

4995
(USPS, March 2010): 142
(2010): 308

where foreclosures are likely. That model estimates serious causes of foreclosures - subprime loans (HMDA Census Tract), increasing unemployment (BLS data on unemployment rate and on house price change). The predicted serious delinquency rate of foreclosures starts (from the Mortgage Bankers Association) by block groups.

between 2004 and 2007: 2313
Mortgage between 2004 and 2007: 22.5
delinquent or in foreclosure: 12.21
93
and July 2009 to June 2010: 55

enough target areas for NSP 3 such that their dollars will have a wide reach. There have been over 1.9 million foreclosure completions in the past year. Target areas are estimated to only be able to address 100,000 to 120,000 foreclosures. This requires focused investment.

to make an impact in identified target area (20% of REO in past

year) (balance) percent fall in home value since peak value (Federal Reserve through June 2010): -24
unemployment rate June 2005: 3.77
unemployment rate June 2010: 10.6
unemployment Statistics

for both neighborhood targeting and to help inform the strategy

in areas with persistently high unemployment? Serious consideration should be given to an area with high unemployment as a homeownership strategy.

in an area where foreclosures are largely due to a combination of high unemployment, and a relatively low vacancy rate? A down payment assistance strategy.

in an area with a high number of substandard vacant addresses in the target area of focus? A demolition/land bank strategy with selected acquisition might be considered.

in an area with a high number of substandard vacant addresses in the target area of focus? A targeted strategy of acquisition for homeownership and rental might be considered.

in an area where this market historically have very high rents with low vacancies? Targeting them as long-term affordable rental might be considered.

1237 -116.532497 43.546931 -116.592751 43.547055

Blocks Comprising Target Neighborhood

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