

Comments the Department Did Not Take Action On

<u>Topic Issue</u>	<u>Summary of Comments</u>	<u>Action</u>	<u>Rationale</u>
Intergenerational Housing	<ul style="list-style-type: none"> ● The Department has two options to provide intergenerational housing under federal and state limitations on combining elderly and family housing. 1) DHCD could set the elderly age limit at 55, allows a person living with a 55 year old to live there, and 20% of units dedicated to family 2) The Department can support projects that have two adjacent projects one for elderly and one for family- each must have their own property name, tenant service plan, regulations, etc.. 	No Action.	The Department will not take action on intergenerational housing at this time.
Housing in Communities of Opportunity	<ul style="list-style-type: none"> ● Allow flexibility in the boundaries of areas of opportunity. ● The Department should create a 20% set aside for projects in areas of opportunity that would apply after scoring to the highest 80% of projects of projects. ● Allow for higher construction costs in those areas. 	No Action: The Department will not create a set aside for projects located in Communities of Opportunity, nor provide flexibility in boundaries, nor increase construction costs in Communities of Opportunity.	<p>The Department does not have enough resources to create a set aside for projects in Communities of Opportunity.</p> <p>Applicants should use the Department’s Multi Family Mapper to see which areas of the state are areas of opportunity.</p>
Housing for Persons with Disabilities	<ul style="list-style-type: none"> ● Lower income levels for PWD units from 60% to 30% AMI or lower ● Increase accessibility of units by requiring elevators in buildings with 3 stories or more and allow a waiver from construction cost limits for accessibility features. 	No Action.	Without Rental Assistance for persons at 30% of AMI, there is not enough income to financially support the project over the long term.
Secretary’s	The Department should bring back 20% Secretary’s discretionary fund in order to	No Action.	The Department will be continuing

Discretionary Fund	fund unique projects that are not competitive under current system but meet housing goals of the state		with State Bonus Points and not Secretary's discretionary funds.
Increasing Tax Credits	The Department should increase the amount of tax credits to \$1,750,000 since it has not increased since 2009 and construction costs have risen 10% over the last two years.	No Action.	An increase in eligible credit amount will further limit the number of projects awards.
Construction Contingency	<ul style="list-style-type: none"> Contingency should be calculated with consideration of project specific risk factors and number of units being constructed/renovated Calculate contingency on site work separately and at a higher rate than that carried for structure costs Carry higher % contingency for high-rise and steel/concrete structures vs. low-rise wood structures Carry a greater % site work contingency for urban sites 	Still open and in discussion at the bi-monthly Construction Working Group meetings.	
Energy Efficiency	To incorporate higher efficiency central system, the Department should increase the threshold annual operating expense per unit for these buildings	Still open and in discussion at the bi-monthly Construction Working Group meetings.	
Processing Requirements & Underwriting Process	The Department should simplify the Guide by putting the processing requirements into a standalone document.	No Action.	The Department will keep the underwriting and processing requirements in the Guide for clarity.
Tenant Service Plan	<ul style="list-style-type: none"> To better improve economic development and prosperity for LIHTC resident and contribute to community development, the Department should consider awarding Developers points for securing operating funds for resident's economic development in their application. For example 1 point can be given for securing 2 years of operating costs related to economic development, 3 points for securing 4 years, and 6 points for securing 5+ years. 	No Action	Internal requirements already exist for monitoring.

	<ul style="list-style-type: none">• The Department should update the QAP to include greater accountability of tenant services. More specifically, tenant service providers must provide evidence of their economic development initiatives. There should be a minimum amount of economic activities per week/month/year for residents. Developers should be awarded extra points on their future projects if current projects are effectively contributing to economic development. Developers should lose points on their future application if they are not meeting the minimum requirements.		
--	---	--	--