

Threshold Letters – I would like to request that IHCD return to the previous format on the threshold letters where the analyst gives the exact location of the threshold issue in the QAP. As well as exactly what is missing from the submission. Some analysts give detail, and others don't. I ask for consistency amongst reviewers during the competitive and non-competitive rounds.

Threshold –

Page 23 – Are square footages of units still required on the architectural drawing unit plans even though there is no longer a minimum requirement on unit sizes? I would think a legend or key on the cover page would be sufficient

Page 26 – Zoning – I am not sure why a preservation/rehab deal would need to provide a zoning letter. The property would clearly already have to be zoned residential/multifamily if property exists on the site. I think this should be removed.

- Are you going to allow projects (non-competitive) to submit without zoning in place or apply with a waiver if zoning is underway? This would certainly save a lot of time and money on the development side.

Page 27 – Form Q needs to be updated. The language is not consistent throughout all the affidavits. I would like to see this form collaborated into one certified form that the developer is signing off on that all development team members listed have been notified they would be listed on the application. I have not been on a project in 10 years where we have listed a partner on Form A without their knowledge. They are typically involved in the predevelopment. I think the owner/developer/applicant should have to sign off that ALL development team members who have been listed are aware of their comments to the project if the application is funded. Having to get 9 Form Q's signed by the development team is excessive.

Page 29 – The ERR workbook needs to be updated. It would be nice to see a FORM that breaks out the ERR information that is needed for Development Fund requests per the LIHTC application.

- This section should be clearer of the timeline to which the ERR should be completed. I am reading it as two separate processes. That the review needs be completed yet we can submit the workbook with the application? I didn't think the review could be completed without submitting the workbook. Please consider a revision of the process you wish to see.

Page 32 – Capital Needs Assessment – Please explain as to why you need a separate "detailed rehabilitation budget" submitted with the capital needs assessment? Page 4 of the capital needs assessment Schedule F (IHCD Schedule) does this already. And it is typically done by general contractor and signed off on by the architect. There should be no need for an additional budget. This seems excessive.

Page 40 – Form N needs to be updated if you wish to have anyone disclose any related party who is not the authorized signatory. Currently, the way Form N reads is it only needs to be submitted for the authorized signatory who is typically the principal of the general partnership. OR – If you are going to keep Form Q, I would delete Form N as this information has to be disclosed in Form Q anyway.

Page 48 – THANK YOU for removing unit square footage minimums!

Page 56 – Need clarification on documents that are uploaded that the analyst can't open! I have uploaded multiple documents to OneDrive that were in PDF format but was told they were unable to be opened? This is something that I double/triple check and started taking screenshots of due to this issue. Are you saying that we can resubmit this via PDF but will still receive a TC? Please clarify. Thank you.

SCORING –

Page 66 – 68: Construction Type – I would ask IHCD to strongly consider a point category for sites that are not “preservation” of existing affordable housing but are rehabilitating an existing market rate development and converting it into affordable units for LIHTC points.

Page 68 – The bonus points for preservation seem unnecessary as in the 9% round, they have their own set-aside. However, in the 4% competitive round, this scoring category makes more sense. In the 9%, the small city and rural communities will not be able to compete with large cities that have more units in the development. I would suggest getting rid of this bonus or refining the language to be specific to location or only for the 4% competitive round.

Page 68 – This makes no sense “The site must have had a previous residential or commercial (non-agricultural) use.” Are you suggesting that the site already be zoned for residential? I am confused on what you are looking for here and exactly what documentation is required. This is very vague!

Page 72-73 – **This category completely negates projects in most small city and all rural communities.** I have yet to find a rural county that has any parcel deemed a qualified census tract. I think this should be removed (Example - W Washington Street: Wayne Township is part of complete revitalization plan that incorporates a site they own and would like to see developed for housing – However, they would miss out on these two points because that site is NOT in a QCT?!) I like that this category is 2 points but needs to go back to the way it was before.

Page 73-74 ABSOLUTELY get rid of Internet Access!!!! If you look at studies, most of our residents qualify for free or low monthly payments on cell service and wifi opportunities.

Most developments offer free WIFI in their community space for residents. This is even done for market rate developments. This is an excessive expense and a hit to the OPEX!

Page 80 – Please get rid of “Non-IHCDA Rental Assistance”. There are very few areas that have access to these resources through public housing agencies and most of those reserve ONLY PBV’s for permanent supportive housing.

Page 83-84 – The counties you have listed as the age-restricted desert areas, all those counties and most of the “places” don’t qualify for points in the Housing Need Category. I am not sure where IHCDA came up with the threshold percentages. But I am looking at two sites in Putnam County and both sites only score 3 points in this 8-point category. If you are really wanting developments in these locations, I would suggest you add an additional scoring category for these counties.