



QAP Comments

November 4, 2014

- 1) **Project and Developer Limits** (7 or 42) The \$750,000 limit per project forces smaller projects or demands large amounts of other subsidy to make larger projects work financially. Consider raising the limit AND consider piggy back funding to support projects of mixed income in urban areas
- 2) **Bond Exceptions to Projects and Developer Limits**: Is a tax credit limit increase allowed based on local support for bond funding for projects per Section C-2 (page 7 of 42)? This seems to penalize other projects that do not have the additional subsidy from the jurisdiction.
- 3) **Tie Break criteria** 7a: Selection criteria (1A)I – “projects promoting project diversity by percentage of limiting low income units.” Is a lower or higher percentage of low income units better?
- 4) **Unit Size Limitations** (page 24) Are minimum units sizes net of hallways or exclusive of hallways and other non-rentable space (i.e. common lobbies, mechanical rooms etc.)
- 5) **Unit Size Limitations** (page 25 – 2b) Are the Total Development Cost limitations per the square foot minimum in section 2a (i.e. a new construction multi-family building in Baton Rouge can have a maximum total development cost no higher than $\$156 \times 650 \text{ sf} = \$101,400$)
- 6) **Unit Size Limitations** (page 27 – 2c) Is this Total Development Cost (TDC) limit the maximum per unit TDC for a tax credit one bedroom NOT INCLUDING other subsidies from government grants, historic tax credits. Philanthropic, FHLB and private investment? Therefore please confirm that the per unit allowable TDC is the limit to the tax credit subsidy per unit rather than the limit on the overall subsidy per unit.
- 7) **Unit Size Limitations** (page 27 – 2d) Please confirm that Community Facility costs are calculated outside of the per-unit TDC allowed. The allowed cost for the community facility is a max of 25% of the eligible basis not-to-exceed \$15 M plus 10% of eligible basis. Please confirm that this is exclusive of other subsidies from government grants, historic tax credits. Philanthropic, FHLB and private investment? Therefore please confirm that the per unit allowable TDC is the limit to the tax credit subsidy per unit rather than the limit on the overall subsidy per unit.
- 8) **Developer Fees** (page 28) – Are there allowed increases to the developer fee if a non-profit is the lead developer?
- 9) **The Market Study** (page 30) – If the developer has commissioned a residential market study already, can LHC review qualifications if not already an approved vendor to determine if they meet the criteria