

2020 SRDP Public Comments and Responses

- 1. Comment:** Please give special consideration to the urgent need for affordable housing for persons with Autism and intellectual disabilities. Knowledge of behavioral and sensory issues affecting these individuals is needed to create suitable housing. Nonprofits in this capacity desiring to develop housing should have lower equity thresholds as they are not only developing housing, but also providing programs and services to their clients. If a project has to be divided into phases in order to meet the equity threshold, the end result will be additional building costs and other carrying costs. More significantly, individuals waiting for housing have no alternatives in South Carolina where they can receive the support services they need to live independently. Consideration should also be given to readiness and components that have already been funded. Projects where land has been purchased, site work completed, permits in place, plans approved by local municipalities, environmental and geotechnical studies complete, wetland delineation complete. The overall project viability including cash available, leverage in place, ongoing funding streams, project readiness should be weighed more heavily than an arbitrary equity requirement. Please consider reducing the current equity levels where the aforementioned components exist. Thank you for your consideration.

Response: SC Housing recognizes the need for affordable housing for persons with disabilities. Supportive and transitional housing projects receive first priority over standard rental housing projects in the tie breaker criteria for 2020. To provide funding opportunities for less experienced non-profits, SC Housing has included an additional tier in the 2020 application that lowers the financial capacity standard minimums for non-profit organizations proposing projects with 4 – 8 units.

SC Housing must verify that organizations that receive funding have the financial capacity to ensure that projects are completed on time and remain financially sound throughout the duration of the affordability period. If these requirements are not met, SC Housing is required to return funds to HUD. This can have a detrimental and lasting effect on the funding levels allotted to the State.

Developing housing involves risk and the use of federal funds to develop housing increases the level of risk. Organizations must have the financial capacity to absorb unforeseen costs that often arise with development activities. SC Housing's financial capacity standards, including the proposed minimum unrestricted liquid asset requirement, are designed to ensure organizations have the capacity to absorb unforeseen costs so the development remains financially sound both during construction and throughout the affordability period.

- 2. Comment:** To determine the amount of funding each unit may receive - we are counting exterior doors – i.e. a three bedroom/SRO unit would count as one unit and be eligible for \$190,000? Is there a different calculation for SRO's? So 1,2, 3, or 4 SRO units would all be subject to the \$190,000 maximum? For purposes of projecting rent income, may we use the SRO or 0 bedroom rent limit for each individual SRO unit? The occupants will be non-related and each have their own individual lease. So, in my three bedroom example, we would use the 0 BR rent Limit x 3 for the three bedroom unit?

Response: Cost containment categories have been included in the scoring criteria for the 2020 SRDP application in lieu of setting per unit maximums. The language limiting the maximum amount of total development costs per unit has been removed from the application.

Different requirements apply to HOME-assisted housing depending upon whether the project is classified as one unit or contains separate and identifiable units. A group home is considered a one unit project. Rents in group homes are based on the appropriate Section 8 Fair Market Rent (FMR) for the unit size. For example, a group home with four bedrooms would use the FMR for a four bedroom unit. Each household's rent would be its proportionate share of the total unit rent.

HUD defines a Group Home as housing that is occupied by two or more single persons or families consisting of common space and/or facilities for group use by the occupants of the unit, and (except in the case of shared one bedroom units) separate private space for each family. It also includes group housing for elderly or disabled persons. Supportive services may be provided. These structures are usually large single-family homes that are being used for this purpose.

HUD defines Single Room Occupancy (SRO) housing as housing consisting of single room dwelling units that are the primary residence of its occupant or occupants. The definition requires the unit to contain either food preparation or sanitary facilities (it may contain both) only if the project consists of new construction, conversion of non-residential space, or reconstruction. For acquisition or rehabilitation of an existing residential structure, neither food preparation nor sanitary facilities are required to be in the unit. If the units do not contain sanitary facilities, the building must contain sanitary facilities that are shared by tenants.

Single Room Occupancy projects consist of clearly identifiable separate units. If the SRO units have neither food preparation nor sanitary facilities, or only one of these items, the rent may not exceed 75 percent of the FMR for a zero-bedroom unit. SRO units that have food preparation and sanitary facilities contained in the unit use the 0 bedroom rent limit.

3. **Comment:** Increase the underwriting standard for operating expenses from \$4,000/unit to \$5,000/unit. SC Housing already employs an underwriting standard of \$4,200 to \$5,200/unit in its 9% LIHTC program, which permits developments of up to 90 units. By virtue of their smaller size, SDRP projects will likely have higher levels of operating expenses on a per unit basis than 9% projects.

Response: The amount of projected operating expenses has been increased to \$4,200 per unit per year, excluding reserves.

4. **Comment:** There are numerous CCRP's in existence that remain active in guiding and facilitating development and which were approved prior to 2010. SC Housing should permit CCRP's approved prior to January 1, 2010 to be used for point scoring purposes so long as the applicant provides a letter from a town/city manager in the area the project is located stating the CCRP is still active and guiding development (or the like).

Response: Plans approved prior to 2010 will not qualify for points. Per state law (SC COL 6-29-510(E)), comprehensive plans developed by local governments must be updated once every ten years. Plans are to be data driven and based on current conditions; realistically, any plan more than ten years old is not a sufficient plan by definition, even if it's still being used to guide local policy.

5. **Comment:** Appendix D: Market Study Needs Assessment - Rent Range asks for a range of rents "from lowest attainable to highest attainable." First, we suggest that you should specify "highest attainable tax credit rent" if that is what you want, because otherwise some analysts might read the requirement to be asking for highest attainable (i.e., market) rent. One variable that can be at play when determining the highest attainable rent is lease up time. In some markets, a higher rent can be attained at the expense of a longer lease up period.

The lowest attainable rent will always be \$0. It is not clear what you intend to be calculated for the lower end of the range. If a proposal is in a desirable location with a hard market, then the highest attainable tax credit rent will be the maximum allowable and the property will lease up as fast as management can process applications. In those cases, there is no reasonable criteria that can produce a range of attainable rents.

Fulfilling this requirement (calculating attainable tax credit rents) will necessitate doing all the work required for a normal LIHTC market study. We believe it would best serve the State's interest to have one set of requirements. It will be easier for everyone involved to only have one set of requirements for what is essentially the same thing. Some of the SRDP proposals last cycle had more units than some of the 9% proposals, and the SRDP proposals have more complicated rent structures. It might make sense to have lesser requirements for very small proposals, but these requirements aren't really lesser, just different.

Response: Adjustments have been to the Appendix D: Market Study Needs Assessment Report Guidelines to address these comments.

Comment: Allow single-family development experience to be used for justification of multi-family projects. Allow consultant experience on multi-family projects to count towards a small percentage of multifamily in a project, so that a nonprofit may begin gaining multifamily development experience. Allow applicants to request funding for 17-24 units if they have \$1.5M net worth and \$200K in unrestricted liquid assets or \$1M net worth and \$500K in unrestricted assets.

Response: The experience requirements in the application manual have been revised to allow experience with the development of single family homes to count towards experience for projects proposing multi-family developments and vice versa. Language has also been added that allows Applicants to use the experience of a consultant to meet threshold requirements as long as the consultant is under contract and the services of the consultant will be utilized to administer the development of the project until the units place in service.

6. **Comment:** Please provide clarification on the tier 1 and tier 2 applications.

Response: Tier I and Tier II Application Checklists are provided on the last two pages of the draft SRDP Application Manual. Items required for Tier I must be submitted to SC Housing between May 13 -15, 2020. Items required for Tier II must be submitted to SC Housing between July 29 – 31, 2020.

7. **Comment:** 30% Brick is costlier and very often doesn't blend in with the character of most neighborhoods.

Response: 30% brick or natural or manufactured stone is required on each wall face. Per section II, F, 1: Exterior wall faces must have an excess of 30% brick or natural or manufactured stone on each of the exterior wall surfaces, including the front wall face, each side's wall face and the rear wall face of the buildings (not to the interior wall faces of open breezeways). On all exterior walls, the brick/stone must extend to all areas of grass, landscaping and other areas of soil or mulch. *This requirement does not apply to rehabilitation projects.*

8. **Comment:** Requiring an ADA accessibility consultant seems over the top, especially the 2 trainings the consultant has to provide. It also adds unnecessary costs to affordable housing. It would accomplish the same result if SC Housing just provided the ADA specs and then the inspection process would make sure the standards were met.

Response: Accessibility specifications are readily available and known by architects. The use of an accessibility consultant to inspect the project during construction is necessary to certify that projects are in compliance with accessibility laws and regulations.

9. **Comment:** Regarding an emergency alert system, is this a requirement for apartments? Is it also required for single-family?

Response: The emergency alert system requirements described on Page 5 of Appendix B: Development Design Criteria apply to all mobility and sensory impaired accessible units in both single and multi-family developments that are required to be in compliance with the regulations of Section 504.

10. **Comment:** Clarification is needed on whether the laundry has to be a room or if a closet is acceptable for single-family. Why are stacked units not permissible?

Response: Laundry rooms or laundry closets are allowed as long as the room and/or closet meet the requirements of section (II, M, 1, a, b, c). Stacked units are not permissible because they are not easily accessible for everyone, such as the disabled, people that are shorter than average in height, and the elderly. Stackable units are often designed to be compact, made to fit small spaces, are not well suited for families and eliminate the option for storage shelving or cabinets above the units.

11. **Comment:** The sunroom/balcony/patio requirement should be acceptable if a single-family home has a front porch. Your manual says a front porch is not a patio. How can a front porch not be acceptable for this requirement?

Response: SC Housing does not consider a front porch to be a gathering area for a single family dwelling. All units are required to have a sunroom, balcony, or patio.

- 12. Comment:** It seems unreasonable to add more potential consultant or vendor fees by requiring photometric software for lighting, and a 3rd party accessibility consultant (where do you even find one of those?) Can these requirements be excluded from single-family developments?

Response: These requirements apply to both single family and multi-family developments. Accessibility consultants can be located by searching the internet for “accessibility inspectors.”

- 13. Comment:** “Plans and specs must include all mandatory and optional design criteria.” Seems like it isn’t so optional then. Surely this was a typo?

Response: Applicants may opt to incorporate design criteria into projects that are not mandatory. For example, an Applicant may elect to commit to build a project to meet a sustainable building certification.

- 14. Comment:** Often municipalities require very lengthy rezoning schedules. Could the required zoning documentation come in Tier 2 instead of 1?

Response: The requirement that the site(s) must have proper zoning in place at time of application has been moved from Tier I to Tier II.

- 15. Comment:** The manual states that each entity can only receive 1 award unless there are funds left over after all qualified projects have been awarded. But you allow up to 39 units in 1 award (assuming it is new construction and threshold requirements are met). What if you changed it to “no more than 39 units can be awarded to a single entity”? That way, and entity could potentially have 2 projects in 2 different areas of need as long as the 2 projects total units didn’t exceed 39 units.

Response: Applicants may submit two SRDP applications and may only be allocated one award. At the discretion of SC Housing, if funding remains available after each applicant organization has the opportunity to be allocated at least one award for a qualified application, an organization’s second application may be considered for allocation. The allocation of a second award will be determined by the applicant’s developmental and operational history and the geographic distribution of awards.

- 16. Comment:** Does the requirement for hallway widths just apply to multi-family apartments or does it also apply to single-family properties?

Response: The width requirements described on Page 7 of Appendix B: Development Design Criteria apply to all developments regardless of whether they are multi-family or single family.

- 17. Comment:** If horizontal banding is used between floors this should be an exception to the requirement to have separate color tones for upper and lower levels.

Response: Developments with horizontal banding between floors are required to have different colors for upper and lower levels.

18. Comment: Do all applications, even if just 4 units require a third party market study?

Response: All applicants are required to submit a Market Study Needs Assessment Report prepared by an SC Housing approved third party market study provider. A list of approved providers will be available on SC Housing's website with the application materials.

19. Comment: Is an accessibility consultant required for single family buildings?

Response: An accessibility consultant is required for all single family projects required by Section 504 regulations to have a percentage of the units accessible to individuals with mobility and sensory impairments. New construction projects with 5 or more units and rehabilitation projects with 15 or more units must meet Section 504 requirements.

20. Comment: Is it the Authority's intent that all proposed developments will have at least one source of federal Funding? i.e. Are you all considering funding any deals with SC HTF only?

Response: The Authority's intent is to fund eligible projects with the most suitable sources based on the specific project model being proposed. It is possible that the only Authority administered funding source that is awarded to a project be SC Housing Trust Fund.

21. Comment: Regarding Public Housing Authority participation, most PHAs would not apply directly as the PHA but would apply utilizing their instrumentality or affiliate. This being the case, would the Authority allow these entities to utilize the PHAs financial and experience criteria to meet the threshold requirements?

Response: The Authority must evaluate the financial capacity and experience of the ownership entity of the proposed project. The capacity of affiliated or related entities cannot be taken into consideration if they have no ownership interest in the project.

22. Comment: Financial Statements (page 20) – We respectfully request a return to the language in the 2018 SRDP manual “If individuals are required as financial guarantors, compiled financial statements will be accepted for those individuals.” We request this section's language be modified so that “compiled” or “reviewed” is sufficient rather than “audited”, which is very time consuming and expensive. Per the 2020 QAP, “reviewed” financial statements are acceptable for the LIHTC program, which has even higher standards for liquidity and assets than SRDP. If a guarantor meets the threshold for the 2020 QAP, we would ask they be considered as having met the 2020 SRDP financial thresholds with the same standard of financial statements.

Response: Language in the application manual has been revised to state that reviewed financial statements are acceptable.

23. Comment: Sustainable Building (page 25) – Please clarify whether developments that pursue the additional 5 points for Sustainable Building certifications will be eligible to use

the “Green Discount” utility allowance on the SC Housing website. The current guidance on the utility allowance section of SC Housing website indicates that only Energy Star and USGBC LEED qualify to use the “Green Discount” utility allowance. Please confirm that the Green Discount utility allowance can be used if a SRDP application chooses to be built and certified to be Enterprise Green Community, Home Innovation Research Lab National Green Building Standard (Bronze or higher), or Southface Energy Institute and Greater Atlanta Home Builder’s Association’s EarthCraft certification program.

Response: Developments that pursue points for sustainable building certifications will be eligible to use the “Green Discount” utility allowance on the SC Housing website.

24. Comment: Total Number of units vs. the number of affordable units (page 7) – Per page 26, the SRDP manual is encouraging market rate units. On page 7, the General New Construction set-aside states developments should be between 9-39 units. Please clarify whether that section is intended to be “9-39 *affordable* units” or “9-39 *total* units *including market rate units*”. The section below that places restrictions on the number of market rate units by saying “developments with 4-24 affordable units” cannot have more than 50% of the total units as market rate. For example, could an SRDP have 24 affordable and 24 market rate units for a total of 48 units?

Response: Projects in the General New Construction set-aside must contain between 9 and 39 affordable units. A mixed income project in this set-aside with 24 affordable units can in addition to the 24 affordable units have an additional 12 market rate units for a project total of 36 units.

25. Comment: Please clarify for us whether you are considering a duplex to be multi-family, or if SC Housing’s definition of multi-family is more like an apartment building.

Response: Page 5 of the application manual defines single family dwellings as buildings with 1-4 units and multi-family dwellings as buildings with 5 or more units.

26. Comment: It appears much of the information was duplicated from the 2020 LIHTC QAP and the comment period was over twice as long for the LIHTC Program. Because of the duplication of information, and given that the Small Rental Program can be single family properties consisting of at a minimum four units, the following items, which add significantly to cost need clarification:

- Page 14, is a SC Housing approved third party market analyst required on all projects? This seems like overkill on smaller projects.
- Is a cost certification prepared by a CPA required at placed in service regardless of the size of the project?
- Page 19, is a Noise study required for every project, regardless of size?
- Is a Physical Need Assessment required for all rehab projects regardless of size?
- Per Appendix B: Development Design Criteria, regardless of project size and unit types, are the following required: Soil Borings Test performed by architect or engineer; Accessibility Training Consultant; Architect Certification regarding Safe Drinking Water?

Response:

- A market needs assessment report prepared by an SC Housing approved third party market analyst is required for all projects.
- A cost certification prepared by a CPA is required at placed in service for all projects.
- Noise studies are required for all project sites.
- Physical needs assessments are required for all rehabilitation projects.
- Soil borings are required for all project sites.
- Accessibility consultants are required for all projects with five or more units.
- Safe Drinking Water Requirements - All new construction projects must have an architect certify on the final plans and/or specifications that that the project will be constructed using lead-free pipes, solder, and flux. All rehabilitation projects constructed in 1988 or earlier must have the pipes, solder, and flux tested for lead and include a copy of the report with the Tier II application. Items testing positive for lead must be included in the Physical Needs Assessment for replacement.

27. Comment: The threshold requirements to participate are onerous and unattainable for many nonprofits that participate in the SC Housing Trust Fund. Additionally, the application fee has been increased from \$500 dollars in 2019 to \$1000 at Tier One and an additional \$500 at Tier 2 for 2020. Only 31% of the available funding got utilized in 2019, SC Housing should develop an application that encourages more participation.

Response: The Micro New Construction Set-aside was created to provide opportunities for less experienced non-profits to develop small projects between 4-8 units. The application fees have been reduced to \$500.00 for Tier I and \$100.00 per site for Tier II.

28. Comment: It has been suggested in the past to allow developments with 1-4 units. If allowed, the participation financial thresholds dollar amounts could also lowered.

Response: The production of affordable housing has substantial economies of scale, meaning that the cost per unit, both for the construction or rehabilitation itself as well as administrative expenses, decreases as the number of units increases. Given the use of public dollars in these projects, SC Housing has an obligation to ensure these resources are spent effectively in the face of an immense housing affordability and availability challenge; these two imperatives point toward funding larger developments. That being said, there are other needs that must be balanced against this, including the need to have properties that are appropriate for rural communities and the need to support community-based nonprofit developers. For this reason, the Small Rental Development Program funds projects as small as four units, and this year created the Micro New Construction set-aside to help meet these goals.

29. Comment: Why require scattered site developments be within a mile radius? I do not see any burden this would have on SC Housing, especially in small towns.

Response: Scattered site projects become more expensive to build, maintain and monitor when the distance between site locations affects logistics.

30. Comment: Why is the rehab threshold per unit \$25,000 for SRDP but only \$20,000 for the LIHTC Program?

Response: The \$25,000 per unit minimum for rehabilitation projects is necessary to ensure that projects are able to remain in compliance with HUD property standards for the duration of 20 and/or 30 year affordability periods. The amount required for LIHTC properties is lower since LIHTC projects have the opportunity to re-syndicate after year 15 to address property standard deficiencies. Projects funded in the SRDP cannot request additional funding during the affordability period.

31. Comment: Why does the Authority allow an Identity of Interest in the LIHTC Program but not the SRDP?

Response: The Authority does allow an Identity of Interest in the SRDP. Language has been added to the application manual to clarify this.

32. Comment: Local government financial contribution points disadvantage smaller communities.

Response: To address the state's housing challenges, it is essential for local governments to demonstrate a commitment to supporting affordability and availability of safe, decent rental housing in their communities. This must take the form not only of thoughtful comprehensive planning, but also financial support. While counties, cities, and towns have many needs in their budgets, it is difficult to argue that providing housing for the local workforce or dignity for older adults does not qualify as a reasonable use of funds. An applicant can receive points toward this item with an allocation of as little as \$4,000, which can be accomplished through an in-kind contribution rather than a direct financial appropriation.

33. Comment: A non-profit developer may have a project that contains more than 8 units. If a non-profit submits an application with more than 8 units we request that the non-profit still be eligible for the Micro New Construction set-side funding for the first eight units of the project with the rest of the units being funded with the relevant pool of funding (General New Construction, Rehabilitation or NSP set-aside).

Response: The Micro New Construction set-aside was created to provide opportunities for less experienced non-profits to gain experience and build capacity while undertaking small projects. Allowing experienced non-profits that meet the threshold requirements to build more than eight units to access this funding would defeat the purpose of the set-aside.

34. Comment: Are Public Housing Authorities eligible for the Micro New Construction non-profit set aside? We would like to see if PHAs can be added to this non-profit set aside pool as they are non-profit in nature.

Response: The Micro New Construction set-aside was created to provide opportunities for less experienced small non-profits to access funding to gain experience and build capacity while undertaking small projects. Public Housing Authorities are not eligible applicants for this set-aside.

35. Comment: At what point in the project would the CHDO Site-Specific Seed Money Loans be issued? What is the earliest the seed money loan could be awarded and issued? We welcome this provision on the SRDP manual as it will help non-profits with carrying predevelopment expenses.

Response: CHDOs awarded seed money loans will be able to request funds after the Tier I application review process has been completed and the seed money loan has been closed.

36. Comment: Can the NIP properties also be eligible and included in the NSP set-aside funding? If possible, we would like NIP properties to be included in the NSP set-aside.

Response: The NSP set- side was created to give owners of NSP funded land banked properties access to funds to redevelop these properties as required by HUD. In the event NSP dollars are not depleted by SC Housing land bank property owners, the remaining balance will be made available to other NSP eligible projects.

37. Comment: Page 12 – Construction Draw Section Bullet 5. Would the CHDO Site Specific Seed Money Loan be an exception to the provision in Bullet 5? It would be helpful to be able to access the CHDO Seed Money Loan before construction has started. We request that these CHDO funds be available as soon as the conditional commitment agreements and program funding agreements are executed or sooner.

Response: Disbursements for CHDO site specific seed money loans are an exception to bullet 5 referenced above. CHDOs awarded seed money loans will be able to request funds after the Tier I application review process has been completed and the seed money loan has been closed.

38. Comment: Application fees: We request the certified CHDO organizations be eligible for a reduced application fee of \$500 for the Tier 1 application and \$250 for the Tier II application.

Response: Application fees have been revised in the manual to \$500 for Tier I and \$100 per site for Tier II. All applicants must include application fees with the submission of the application.

39. Comment: Scoring Criteria: The 5 points for a project with all units not being located in a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) should be reconsidered and removed from the scoring criteria. R/ECAP communities need access to quality, affordable housing and SRDP projects should not be penalized for being located in R/ECAP communities.

Response: As part of SC Housing's federal obligation to affirmatively further fair housing, we must discourage placement of new affordable housing in areas where persons of color are systematically deprived of economic opportunity. Please note that these scoring criteria do not disincentive preservation of properties in these areas; indeed, this activity is encouraged when done in conjunction with a concerted community revitalization plan.

40. Comment: Page 77-Community Rooms, Site Amenities & Facilities - I did not see a threshold for these to apply, so the way I read it, these apply regardless of the number of units. It seems infeasible to provide and maintain community rooms, exercise rooms and playgrounds, especially for the smaller projects.

Response: Language has been added to the application manual to clarify that community rooms, site amenities, and facilities are not required for SRDP projects. Projects with more than twenty units may elect to include an office, maintenance room, or community room.

41. Comment: Page 82-Exterior Wall Finishes - The 30% brick requirement on single family detached doesn't always match the character of the surrounding neighborhoods. The brick or stone veneer on slab foundations up to 16" is appropriate.

Response: The 30% brick requirement has been removed for single family structures.

42. Comment: The area for our primary site we want to apply to SRDP for is in a HEAVILY gentrifying area, but the census data hasn't seemed to catch up with that yet. What would happen to an application if the ratio for area median income wasn't even high enough to score a point, yet we submitted something from the city that talked about the heavy gentrification in this neighborhood?

I get that we wouldn't get points, but I wonder, based on the SRDP intention that you don't want them in concentrated areas of low-income, would this automatically kick us out just based on this ratio, and if so, could we offset that rejection with some kind of city letter like I'm talking about above?

Response: All sites must meet the Site and Neighborhood Requirements described on Pages 29 – 31 of the application manual. Per federal requirements, sites located in areas of minority concentration must meet exception one or two to be eligible for funding.

43. Comment: Do you consider SRO units as units necessary to meet the threshold requirements for units constructed. Also, will you allow a certificate of occupancy to be received prior to funding and not at application? We have a contract with a consultant that meets the threshold requirements for experience. Can the experience of our consultant be used to meet the threshold requirements?

Response: SRO units can be counted towards the threshold requirements for experience. To be counted as successfully completed units, the SRO project must have received certificates of occupancy and reached stabilized occupancy by the Tier I application deadline on May 15, 2020.

44. Comment: What is the reasoning for picking the rehabilitation project size from 9-23 units?

Response: The allowable number of units in SRDP rehabilitation projects is 9-24 units. These amounts were chosen to provide funding opportunities for rehabilitation projects that have less than the minimum number of units permitted in the LIHTC Program, which is 24.

45. Comment: Why can't HOME funds be combined with another PJs HOME funds? The regulations allow it.

Response: SC Housing's policy that the Authority's HOME funds are not combined in a project with HOME funds from another participating jurisdiction is in place to (1.) prevent double counting of units in HUD's IDIS system, and (2.) to not create a situation in which the Authority cannot claim credit in HUD's IDIS system for all units funded with Authority HOME funds. (i.e. When funds from more than one participating jurisdiction are funding sources in the same project, both participating jurisdictions cannot claim completion of the same unit.)

46. Comment: How is the Authority determining awarding priority between the LIHTC cycle and the SRDP cycle for new construction projects? Applications are due on 4/24/2020 for LIHTC with reservation letters anticipated to be going out in August. SRDP tier 2 applications are due on 7/31/2020. Both application cycles preference the same market. With application submittal costs expensive and the potential for markets not being able to support both developments, how is a determination going to be made?

Response: The development of the Qualified Allocation Plan and funding guidelines for SRDP were done with the same goal: Addressing the state's affordable housing issues, as articulated in the Housing Needs Assessment and elsewhere, as effectively and efficiently as possible. For that reason, many identical or similar scoring criteria apply to both programs. This is a feature, not a bug. If a LIHTC application and an SRDP application have overlapping primary market areas, that information will be taken into account in both market study reviews, just as would be done if two such applications were submitted in the same program. Funding guidelines are re-evaluated after each round of awards to ensure programmatic efficacy.