

DHIC, Inc. 2014 QAP Comments

I. What's Good About the 2013 QAP

- A. 10% setaside for rehab of existing housing (IIA)
- B. Metro competition narrowed to Wake and Mecklenburg. Guaranteeing 2 in each county was good.
- C. Principal and project award limits (IIE)
- D. County award limit changes (IIF1a)
- E. Site scoring (IV1b) – increase to 1 mile; change in how distance to amenities is measured; removing right turn only penalty
- F. Good that rehab projects don't have to meet site scoring criteria

II. What Needs to be Changed

- A. Remove 20% cap on nonprofits, not fair (D2) while a cap didn't come into play it's still not fair
- B. There is no scoring system in essence, it boils down to credits/unit. Many perfect scores.
- C. Tie breaker: other measures of what constitutes a good project other than credits/unit
 1. Credits per unit should not be deciding factor- change other criteria/points so that there are fewer projects decided by tie breaker
 2. Expand tie breaker criteria – e.g. underserved county (e.g. credits per capita awarded)
 3. Lower than max allowable rents
- D. Bring back mortgage subsidy pts in Metro region, add general local government participation and support (fee rebates, tax incentives, land donation, density bonuses, sustainability bonuses, etc.)
- E. General comment about architectural design quality suffering, related to B above – design quality should be protected as this is what helps the community accept affordable housing and maintain positive perceptions of affordable housing and the LIHTC program in general
- F. TOD should be encouraged – no/fewer amenities required; like a redevelopment project, TOD projects should have the opportunity to be funded/ should be encouraged – shouldn't have to score
- G. Explain criteria for removing counties from competition (F1b) – funding for a senior project should not preclude funding for a family development

- H. Notes about application itself?
- I. Site scoring – Move to before tie breaker
 - 1. Amenities category (27 pts)
 - a) Add positive points for other types of community resources present within 1 mile radius (list – transit/bus stop, school, park, library, hospital, fire/police station, post office, restaurant, full service bank...) As is there is a bias for suburban/greenfield locations.
 - b) Add Weaver Street Grocery
 - 2. Site Suitability (15 pts)
 - a) Clarify new language re: blind curve and crossing traffic
 - b) Remove “high traffic corridor” from incompatible use list – market project are frequently built near highways
 - c) Small setback for resyndication of Year 15 projects, but should not do if primary developer motivation is to get developer fee. Option should only be available to developers who have a positive track record of compliance and management.
 - d) High income census tracts points
- J. Remove penalty for requesting STC loan (IVB2)
- K. Specifically address PP bond, where to list in development costs
- L. Appendix B – Design Quality Standards - Reduce parking requirements in BVF to 1.5 per unit for family projects

Also, what about:

- Mixed income projects/market rate units? -- beyond RPP disallowment in IVC2; also see IVE1, penalty for project with market rate units and way to get around it
- Green/sustainability?
- In state GC
- Operating expenses more like actual as opposed to minimum – or raise minimum.
- Maximum # of applications that can be submitted by an applicant
- Evidence of consistency with local plans and priorities – provide Consolidated Plan section addressing this, where applicable
- Evening up playing field somehow for projects that have high impact fee requirements