

SECTION 1 - GENERAL PROVISIONS			
Q	Section	Question/Comment	LAHD's Response
1	1.1	LAHD should consider creating a master calendar for the year and aim to have rounds at a consistent time annually. This would make the release of funds more predictable and reliable and help developer maintain their own timelines.	AHMP NOFA Timeline - The AHMP program strives to coordinate LAHD policies with outside funding sources in order to facilitate the funding application process to our stakeholders. Additionally, the LAHD has been working with HACLA, LACDA and HACOLA to coordinate the application format and process. Individual funding cycles have prevented a uniform release of coordinated regulations and NOFA. Future efforts are being made to be able to release a coordinated application with a uniform timeline.
2	1.1	Because LAHD is proposing to release the NOFA in the summer and have it due in the summer, it would be helpful if LAHD could release specific dates as soon as possible. Many people are out during the summer and more advance knowledge of the timeline would help people as they coordinate plans during this time. Please confirm at least one month between NOFA issuance and Application Due Date.	See above.
3	1.1	Entity requests that LAHD hold the Notice of Funding Availability (NOFA) bidder's conference earlier than currently proposed. This will create a longer gap between when LAHD responds to stakeholder questions and the NOFA deadline, giving developers more time to adjust their applications based on this feedback. Please consider coordinating with LACDA so that LAHD can offer its awards in time for LACDA's next funding round.	See above.
4	1.1	Because LAHD is proposing to release the Notice of Funding Availability (NOFA) in the summer and have it due in the summer, it would be helpful if LAHD could release specific dates as soon as possible, as many staff and consultants are out of the office during the summer. For similar reasons, LAHD should provide 60 days between NOFA issuance and the application due date.	See above.
5	1.1	It would also be helpful if LAHD holds the NOFA bidder's conference earlier than currently proposed so that LAHD could respond to stakeholder questions long before the NOFA deadline, giving developers more time to adjust their applications based on this feedback.	See above.
6	1.1	LAHD should coordinate the timing of its awards with LACDA's NOFA so that LAHD can announce its awards in time for LACDA's next funding round.	See above.
7	1.1	In addition, LAHD should create a master calendar for the year and aim to have rounds at a consistent time annually. This would make the release of funding applications more predictable and reliable.	See above.

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8	1.1	Entity requests that LAHD hold the Notice of Funding Availability (NOFA) bidder's conference earlier than currently proposed to allow more time between when responses to stakeholder questions are issued and the NOFA deadline.	See above.
9	1.1	What date will final project recommendations be presented to City Council for approval, and are there any committee level approvals before that?	See above.
10	1.1	Timelines should be firm, published in advance, and shorter. Having floating timelines that continually get pushed out makes it very difficult for developers to negotiate with land sellers and keep sites in contract. In fact, we were awarded a spot in the most recent Managed Pipeline competition for our project on Venice Blvd. but could not keep the site in escrow due to the protracted time prior to the announcement. Of course, this was disheartening for us, but we also damaged a relationship with a broker and a property seller, spent money on architecture and studies which cannot be recovered, and most importantly we will not be providing homes to 60 individuals currently experiencing homelessness on the streets of Los Angeles.	See above.
11	1.2	Since HHH funds are depleted and there does not appear to be any other pool of funds available for affordable housing projects, LAHD should consider creating set asides – 9% and 4%, including preservation – so that different types of projects have a path towards obtaining subsidies from the City of Los Angeles.	Through the AHMP program, LAHD provides funds for affordable housing including supportive and at-risk housing and has established goals pursuant to the City's Consolidated Plan. Section 5.6.6 describes the selection process including 9% at-risk/preservation projects.
12	1.2	Since HHH funds are depleted and there does not appear to be any other pool of funds available from LAHD for affordable housing development, LAHD should consider creating set-asides or minimum allocations for 9%, 4% and preservation projects so that different types of projects have a path towards obtaining subsidies from the LAHD.	Same as above.
13	1.3 & 5.6	If a project is being submitted for AHSC funding in the fall but isn't ready for CDLAC/TCAC in first round 2024, are we able to apply to AHMP this round?	The NOFA is targeting projects ready to apply to TCAC/ CDLAC 2023 Round 1 & 2 and 2024 Round 1 only.
14	1.10.4.1	LAHD should not charge interest during construction.	No change. LAHD deems that the AHMP program's loan terms are reasonable and comparable to similar programs.
15	1.6	Says, "As a condition of "Project Readiness," projects...must be also have a commitment for sponsor-based or project-based rental assistance..." . And then Section 2.9 appears to define "Project Readiness" as "sixty days prior to the CTCAC deadline". We would therefore suggest that this timeframe be reduced or eliminated so that projects that are waiting to hear back from HACLA or other issuing authorities can proceed with their CTCAC application provided that the commitment is name prior to the application deadline.	No change. LAHD funding awards need to go through a lengthy Mayor and Council approval process. These awards need to be approved prior to a TCAC application round. Therefore, projects that intend to apply for tax credits are required by LAHD to prove their "Readiness" (e.g. EFCs and HACLA vouchers if needed) at least 60 days prior to a TCAC app deadline.

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16	1.15	For commercial components in a QCT where costs are allowable in the tax credit basis and no commercial income or expenses are shown in the project pro forma, the applicant should not have to break out the commercial and residential in the sources and uses.	No change. As a lender in these projects, LAHD must understand all components and related costs to these projects.
17	1.18	Additionally, as the author of the ordinance leading to the standardized pet policy in section 1.18, I'm pleased to see it included. However, it appears that the section heading referring to the County is potentially misleading and should be amended to refer only to the City of Los Angeles.	Noted.
18	1.12.2	LAHD should provide clarity on whether or not Article 34 Authority availability impacts a project's eligibility for a funding award. LAHD should also expand on what would happen if the Department received several applications in a particular district that would exceed the remaining authority.	No change. Article 34 does not impact threshold or scoring. However, applicants are strongly encouraged to notify the LAHD Housing Bureau, ahead of the AHMP NOFA application deadline, in order to confirm availability.
19	1.12.2	Availability of Article 34 Authority should not impact a project's eligibility for a funding award since LAHD intends to obtain additional authority in November. Instead, LAHD could make availability of Article 34 Authority a closing condition. If the availability of Article 34 Authority does impact a project's eligibility for funding, LAHD should explain what will happen if the Department receives several applications in a particular district that would result in exceeding the remaining authority.	Same as above.
SECTION 2 - THRESHOLD REQUIREMENTS			
20	2.2.2	LAHD should allow developers to forgo the voluntary acquisition letter if the required language is included an executed purchase agreement.	Yes, if and only if the PSA includes the exact language referenced in the voluntary acquisition letter template. If it is not the exact language, then it will not satisfy the threshold requirement.
21	2.2.3	Entity requests a specified timeframe in which LAHD will provide approval of the relocation plan. If LAHD does not respond within the timeframe, then the developer should be able to carry out relocation activities as directed by a qualified relocation consultant so as to avoid delays to the development timeline. Please clarify that the GIN notices required by the application can be issued without having an approval on the relocation plan from LAHD.	At the time of application, completed and mailed GINs including a relocation plan are required. GINs must follow the templates included as attachments to the application. Additionally, approval of the relocation plan is not required at the time of NOFA application.
22	2.2.3	For properties in escrow at the time of application, it is extremely common that the current owner will not permit the serving of GINs. Since this is more common than not, it should be listed as a permitted exception for good cause as to why it was infeasible to issue GINs.	No change. HUD requires Participating Jurisdictions such as LAHD (PJs) to ensure that the GINS are served at the time of first negotiations.
23	2.2.3	LAHD should provide clarity on whether or not developers may issue the GINs required by the application before having an approval on the relocation plan from LAHD.	See above.

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24	2.2.3	LAHD should provide clarity on whether or not developers may issue the GINs required by the application before having an approval on the relocation plan from LAHD.	See above.
25	2.6	Maximum projects per developer should either be raised or eliminated. The City's goal should be the greatest number of high-quality units. If projects are submitted that meet the City's goals, and organizations have capacity, they should be allowed to qualify. This cap also discourages partnerships and penalizes larger nonprofits that may be part of a partnership to help a for-profit developer or a smaller nonprofit developer. If partnership projects are going to be subject to this rule, the primary development partner should be the only entity counted.	No change. This policy is designed to prevent the over-concentration of projects in any one developer and to limit the amount of funds LAHD may lend to the same developer. As a lender, LAHD adheres to this policy to limit its financial risk and exposure.
26	2.6	Remove cap on number of projects that can be in the pipeline at any given time. There are projects that are in the predevelopment pipeline that are still trying to compete for vastly oversubscribed resources at the state level as well as at HACLA (PBV shortage).	Same as above.
27	2.12.1	When projects are rehabilitating existing affordable housing developments, LAHD should allow developers to submit documentation of outstanding balance of existing debt rather than submitting a new appraisal, in cases where acquisition cost is equal to existing debt.	No change. HUD requires PJs to collect the most recent appraisal report for the proposed property, and to ensure that the amount of "land" in the development budget is supported by a current appraisal report.
28	2.12.1	When projects are rehabilitating existing affordable housing developments, LAHD should allow developers to submit documentation of the outstanding balances of existing debt rather than submitting a new appraisal, in cases where acquisition cost is equal to existing debt.	See above.
29	2.12.2	If ownership had not changed and no changes have occurred on the site since the last report, LAHD should allow submission of phase I and phase II reports completed within the last 2 years on the condition that developers provide updated environmental assessments completed within 6 months of the construction closing.	HUD requires PJs to collect updated Third-Party reports including environmental studies.
30	2.12.2	If ownership has not changed and no changes have occurred on the site since the report, LAHD should allow submission of Phase I and Phase II reports completed within the last 2 years on the condition that developers provide updated environmental assessments completed within 6 months of the construction closing.	See above.
31	2.16	Entity requests that LAHD explicitly state that these requirements can be waived for all adaptive reuse projects, rather than just "rehabilitation" projects.	No change. Adaptive reuse is not considered rehabilitation and therefore, we require architectural/ conceptual plans at the time of application.
32	2.16	We request that the bedroom and size requirements can also be waived for adaptive reuse projects. If that is the intent of the section, please revise language to explicitly reference such development types.	No change. CTCAC Regulation Section 10302 state adaptive reuse projects are not rehabilitation projects and therefore must adhere to new construction dimensions.

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33	2.20	Please clarify if relocation applies to just residential, not commercial, relocation. Full points should be awarded to a project that has no residential relocation but may have some commercial relocation. This happens when sites with blighted buildings are upgraded to higher/ better use for affordable housing, and new projects should not require 100% more residential units (i.e. double) when no residential relocation is involved.	Relocation applies to both residential and commercial relocation. Whenever federal funds are used in a project, HUD requires PJs to comply to the Uniform Relocation Act which covers both residential and commercial relocation.
34	2.21	LAHD should specify that the minimum amount for furniture per unit should be for Special Needs/Homeless units only, not general affordable or other units in a Special Needs/Homeless project.	The \$3,000/unit only applies to Special Needs/Homeless units, regardless of project type.
35	2.21	LAHD is establishing a minimum underwriting amount for furniture of \$3,000 per unit. LACDA establishes \$3,000 per unit as their maximum. <u>Recommendation:</u> Adopt \$3,000 per unit as an underwriting allowance and specify that the furniture is required for Special Needs/Homeless units only.	See above.
36	2.21	Clarify that the minimum amount per unit for furnishings in a SN/SH project is for SN/SH units only, not general affordable or other units in a SN/SH development.	See above.
37	2.21	A minimum furnishing requirement of a table with 4 chairs in a standard studio or one bedroom PSH unit is difficult to achieve. Given the City's CASp clearance requirements enforced by NAC, units aren't often big enough to accommodate a table with 4 chairs. We propose a minimum of 2 chairs.	LAHD will change this requirement to a two-chair minimum.
38	2.21	Entity members are concerned that a table with 4 chairs in a Permanent Supportive Housing studio is spatially unrealistic and may encroach on ADA requirements for mobility around other furniture and equipment in the unit.	See above.
39	2.21	LAHD should specify if lamps are still required even if a unit is furnished with switched, fixed light fixtures.	See above.
40	2.21	We agree with the new section to include a minimum budget for furnishing special needs units, however, we believe that in addition to the other items listed, a dining table with two (2) chairs (versus four (4)) should be permitted.	See above.
41	2.21	LAHD should specify that the minimum amount for furniture per unit only applies to units targeting homeless households. In addition, LAHD should specify if lamps are still required if a unit is furnished with switched, fixed light fixtures.	See above for the minimum amount. No change to the lamp requirement. The goal here is to align with the requirement of L.A. County.
42	2.22	We agree that previous round tiebreakers are important criteria, however, some rounds have unusual circumstances which could have made their tiebreakers particularly low or high. We suggest to look back to the previous two rounds and submit justification if using the tiebreaker from two rounds back.	No change. In order to evaluate projects LAHD will compare to the most recent data available and therefore will use the most recent TCAC round.

SECTION 3 - UNDERWRITING, COST, and PRICING GUIDELINES			
Q	Section	Question/Comment	LAHD's Response
43	3.5	In light of increasing developer expenses and inflation, LAHD should consider revising the \$2.5 million cap, and potentially align with CTCAC regulations Section 10327(c)(2)(A) for 4% LIHTC applications, which is \$2.5 million plus \$20K for each tax credit unit above 100.	No change. LAHD is a gap lender of public funds and therefore elects to include a cap on paid developer fees.
44	3.5	In light of increasing developer expenses and inflation, LAHD should consider revising the \$2.5 million cap, and potentially align with CTCAC regulations Section 10327(c)(2)(A) for 4% LIHTC applications, which is \$2.5 million plus \$20K for each tax credit unit above 100.	See above.
45	3.5	<u>Recommendation:</u> Fully align with CTCAC regulations Section 10327(c)(2)(A) for 4% LIHTC applications, which is \$2.5 million plus \$250K for each tax credit above 100.	See above.
46	3.5	Limits on developer fee paid from development financing sources for 4% LIHTC projects should be increased to the maximum allowed under current California Tax Credit Allocation Committee regulations Section 10327(c)(2)(A), which is \$2.5M plus \$20K for each tax credit unit above 100.	See above.
47	3.5	All projects (not just 9% and 4% acquisition and rehab projects) should be permitted to structure the developer fee in accordance with the latest approved CTCAC and CDLAC requirements. This streamlines the application process, aligns policies across funding programs, provides greater certainty for developers, and reduces administrative burden.	See above.
48	3.7.3	Entity objects to the requirement that all architectural contracts must use a standard AIA form as it limits developers' ability to create documents that are more favorable to the developer/owner. Because these documents are legally binding and between the developer and the architect, the decision on whether to modify such a document or use another entirely should be left up to the parties involved. If LAHD's goal is to ensure certain provisions are in the contract, Entity recommends that those provisions/requirements be made explicit rather than requiring one form of contract.	No change. LAHD has been encountering numerous issues, including liability issues that are related to architectural and construction contracts, simply because the AIA standard form was not used. This language is added in the regulations to ensure consistency across contract documents and to emphasize to all the stakeholders that LAHD requires the use of industry standard AIA forms.
49	3.7.3	LAHD should not require architectural and general contractor contracts to follow use unmodified AIA formats. The standard AIA forms are created by trade groups that represent architects and engineers. They do not necessarily have developers'/owner's best interest in mind, but instead provide more favorable terms to architects, engineers, and contractors. This requirement would limit the developer's ability to create documents that are more favorable to the developer/owner. Additionally, because AIA is a national institute the standard template doesn't necessarily reflect California regulations. If LAHD's goal is to ensure provisions are in the contract, LAHD should explicitly specify what those provisions/requirements should be in the regulations and that LAHD can request some form of call out for those provisions rather than requiring one form of contract.	See above.

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50	3.7.5	Entity members have concerns about requiring architectural contracts to follow standard AIA formats. The standard AIA forms are created by trade groups that represent architects and engineers. This means that they do not necessarily have owners' best interest in mind but instead provide more favorable terms to architects, engineers, and contractors. This requirement would limit the developer's ability to create documents that are more favorable to the developer/owner.	See above.
51	3.7.5	Additionally, because AIA is a national institute the standard templates don't necessarily reflect California regulations. If LAHD's goal is to ensure certain provisions are in the contract, Entity recommends that those provisions/requirements be made explicit in the regulations and that LAHD request some form of call out for those provisions rather than requiring one form of contract.	See above.
SECTION 5 - SELECTION CRITERIA			
Q	Section	Question/Comment	LAHD's Response
52	5.1.1.A	Projects which do not require discretionary approvals ("by right" or ministerial through mechanisms such as SB 35, QPSH, and other ministerial processes) should be eligible for maximum points in this category, provided that LADCP provides the Applicant with written confirmation that the Applicant's proposed project will not require a discretionary approval.	No change. Per Exhibit 02- City Planning Department memorandum, all ministerial, including "by-right" and discretionary projects shall be submitted to the Affordable Housing Section of LADBS or LADCP, respectively.
53	5.1.1.A	Similar to our overall comment on readiness, making entitlements a point category means that any project that is not inherently "by right" will require the applicant to spend resources on a project that may not get funded. Entity and many of our nonprofit colleagues at other organizations do not typically take risks like this. Our standard procedure has been to put properties into escrow and do only as much due diligence and architecture as would be required to secure a first source of funding. Once funding is committed, we release deposits held in escrow and move forward with all other development activities. Making entitlements a point category shifts a lot of risk to the developers and could result in the applicant pool skewing towards for-profit developers with a higher risk tolerance.	See above.
54	5.1.1. C	Entity recommends that the regulations specifically state that the following projects will receive full points in this category: conversion and rehabilitation of occupied SRO units into studios/one bedroom units; re-syndication projects that submit relocation plans and commit offering all existing residential tenants the right to return; or, projects that are relocating only commercial tenants.	No change. LAHD funded projects must adhere to federal, state and local laws and regulations pertaining to relocation of tenants and businesses. In order to address the urgency in providing affordable housing in an efficient and timely manner, LAHD will continue to award points to projects that can immediately start construction and therefore will award points to projects that have no relocation or to projects for which relocation is minimized.

Q	Section	Question/Comment	LAHD's Response
55	5.1.1.C	Projects meeting at least one of the following criteria should receive full points: Projects involving the conversion and rehabilitation of occupied SRO units into studios/one-bedroom units if all tenants will be given the right to return and a relocation plan is submitted; re-syndication projects that submit relocation plans and commit offering all existing residential tenants the right to return; or, projects that are relocating only commercial tenants.	See above.
56	5.1.1.C	Projects which involve redevelopment of a public housing site in partnership with HACLA should be eligible for maximum points in this category. As part of HACLA's redevelopment efforts, the public housing sites are often redeveloped in phases which require the current residents of those communities to relocate temporarily during the construction period which could be greater than 12 months for New Construction projects. Even with a Build First solution, we are still "relocating" tenants when we move them into a new unit. Therefore, public housing redevelopment projects should not be penalized for relocation of current residents during the construction period, since all residents have the right to return and should be awarded a maximum of (4) points pertaining to the Relocation Category.	See above.
57	5.1.1.C	If the goal is to reduce displacement, it should be done as a ratio, as relocating a few people to building a whole project is generally worthwhile and appropriate. If the goal is readiness, relocation should not apply. In our projects that will eventually require relocation, we prefer to demolish them early or keep them leased until closer to construction. We keep them leased to 1) avoid the multitude of issues that come with owning a vacant building in the City of LA and 2) reduce early predevelopment costs of relocation and site security. If the City is willing to fund demolition before construction, then this would be more appropriate.	No change. The scoring criteria awards points for "no relocation" as well as minimal relocation.
58	5.1.2	LAHD should prioritize scoring for City-owned sites awarded for development through an RFP process. This will incentivize developments on public land. Additionally, these projects are the most demanding for LAHD staff, so it may be helpful to make sure they are funded first.	No change. AHMP scoring regulations allow the land value of publicly owned land to be counted as committed funds to garner points.
59	5.1.2	To align with the State, County and the City's goal to increase the supply of affordable housing through the development of publicly owned surplus land, LAHD should include a scoring category to award additional points to projects that utilize government owned land, with additional bonus if the site is on land owned by the City of Los Angeles.	See above.
60	5.1.2	CHDO- We suggest reducing this scoring category to 5 points. This would allow for a 5 point category for government-owned land.	See above.

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61	5.1.2	LAHD should change the scoring to provide separate points for committed funding vs. leveraged funds. Commitments for other funding sources is an indication of readiness to start construction while budgets that include significant non-City funding sources shows how City funding will be leveraged to secure additional project funding. It is important for LAHD to be the first source of funding because it allows projects to be more competitive for County of Los Angeles and state funding programs. The currently proposed regulations will make Los Angeles projects less competitive at the state level because projects from other areas of the state will presumably have local financing already committed when they apply.	No change. The City faces an emergency and must adopt policies that rapidly address the increasing demand for affordable housing. In order to address readiness and to efficiently leverage other sources, the proposed regulations award points to projects with outside funding sources that are already committed.
62	5.1.2	Entity requests that LAHD further reduce the points associated with Leverage of Committed Funding Sources and/or revise this section to only evaluate a project's ability to leverage LAHD financing with other sources. As a local funding source, LAHD's funds would be most strategic when used as " first in funding " that ensures projects are more competitive for funding at other levels, such as the County and State as they were in years past. The current system will put Los Angeles projects at a disadvantage when competing with other projects statewide that presumably will have local sources of financing already committed.	Same as above.
63	5.1.2	Committed funding should not be a point category. As one of the largest cities in the country, City of LA funds should be available as a first source for projects. Not only is this critical for housing production in Los Angeles, local funding makes projects competitive for other sources projects may leverage. Additionally, if the City wants to ensure that developers are leveraging its funds as a resource, it can do that without having the funding committed.	Same as above.
64	5.1.2	Entity recommends that LAHD reduce the weighting of this section as it is currently written or revise its goals. Many developers rely on LAHD as their first source of funding. Scoring should match this approach, which allows projects to be more competitive at the county and state level. Under these regulations, LAHD may end up making Los Angeles projects less competitive at the state level, because projects from other areas of the state will presumably have local financing already committed when they apply.	No change. The City faces an emergency and must adopt policies that rapidly address the increasing demand for affordable housing. In order to target projects that are most ready to apply to CTCAC, the proposed regulations award points to projects that have committed funding sources, will not require relocation and have entitlements approved. Additionally, federal HOME regulations are subject to subsidy layering review requirements, and scoring system is designed to maximize leveraging and readiness.
65	5.1.2	In general we believe that the Financial Efficiency/Readiness section should be modified substantially so that local funds (LAHD) is considered a first source .	Same as above.
66	5.1.2	We appreciate that LAHD is lowering the importance of leveraging funds, since LAHD is often a first-source financing opportunity. However, by placing emphasis on committed funding sources, we are concerned that LAHD is stepping away from a longstanding commitment to being a first-source opportunity. Recommendation: Return to the previous AHMP leveraging construct where one category awarded points based on the ratio of HCIDLA resources to a development cost and another awarded to points for committed, non-City of Los Angeles soft resources.	Same as above.

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67	5.2	It appears the in-text title should be updated to reflect correct scoring total of 28 points, not 29.	Noted.
68	5.2.1	<p>In order to align with CTCAC General Partner Experience requirements, in the February 2, 2021 version of the Affordable Housing Managed Pipeline Regulations, LAHD adopted CTCAC Section 10325 (c)(1)(A)(i) "General partner experience" in its entirety. In LAHD's 2022 proposed regulations, the language in Section 5.2.1 hasn't changed since last year and it continues to mirror CTCAC and CDLAC language. We appreciate the fact that by keeping the following sentence with emphasis on the underlined phrase, general partner experience can be garnered from either California Low Income Housing Tax Credit (LIHTC) projects of any housing type OR California LIHTC projects of the Special Needs Housing Type. "For special needs housing type projects only applying through the Nonprofit set-aside or Special Needs set-aside only, <u>points are available as described above or as follows...</u>". Confirmation Requested: Please confirm that the language "<u>points are available as described above or as follows...</u>" means that developers proposing Special Needs projects can garner points under either pathway, which mirrors how these points are applied under CTCAC Section 10325 (c)(1)(A)(i). We respectfully request this clarification because we were incorrectly denied General Partner Experience points on appeal last year. The following is an excerpt from LAHD appeal response for Entity (address) dated July 22, 2021 .Pursuant to Section 5.2 of the AHMP Regulations, in order to receive points under the General Partner and/or Management Company Experience, if the proposed project will be applying under the CTCAC's Special Needs and/or Nonprofit Set-Aside, then the applicant is required to submit documentation showing evidence of experience on special needs projects. The applicant submitted a list of projects for this category. However, the list does not indicate whether or not the projects are special needs.</p>	<p>LAHD confirms that the language will stay as is, i.e. there will be no change. LAHD will keep the language for special needs points as "points are available as described above or as follows...".</p>
69	5.2.1	The requirement applying to "general partners, and a key person" should be changed to "general partners, or a key person."	No change. As a lender in the majority of these projects, LAHD elects to use stricter guidelines regarding General Partner and Property Manager experience.
70	5.2.1 and 5.2.2	Instead of the proposed language in this section, the AHMP regulations should state that Applicants must submit evidence in accordance with CTCAC Regulation Sections 10325(c)(1)(A) and 10325(c)(2)(B) to receive maximum points in these sections. This streamlines the application process while ensuring that the Applicant will score maximum points with CTCAC. As written, there are slight differences between LAHD's regulations and CTCAC's regulations, which adds unnecessary complication and confusion. AHMP regulation Section 1.4 Eligible Applicants already gives LAHD the ability to deny applications from individuals or entities that have not met current LAHD Business Policy, so there is no need to reinsert that requirement into this section.	Same as above.
71	5.2.2	Sub-bullet iv. was added stating "applicants for Special Needs/ Homeless projects shall include special needs/ homeless projects in their experience list." This should be clarified to, "applicants for Special Needs/Homeless projects shall include AT LEAST ONE special needs/ homeless projects in their experience list."	No change. Please see Section 5.2.1 (ii)- Special Needs

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72	5.2.2	The CHDO rules as proposed in concert with Section 5.2.1 make it so that no new CHDOs can participate in the NOFA. If one of LAHD's goals is equity and inclusion, CHDO's should be able to qualify for points by either 1) partnering with an experienced organization that may not be a CHDO or 2) having a "key person" that has qualifying experience.	REVISION to Section 5.2.2. LAHD will revise this section by deleting the first paragraph in the section that states "In order to qualify for CHDO points, the proposed general partner or managing general partner must first qualify for maximum points under Section 5.2.1. Applicants who do not receive maximum points under Section 5.2.1, then the applicant shall not be awarded CHDO points."
73	5.2.2 and 5.2.3	LAHD might consider separating its points awarded for developers working with CHDOs or BIPOC organizations. These are not mutually exclusive because non-BIPOC organizations can become CHDOs. By only giving 10 points for working with CHDOs or BIPOC organizations, LAHD may be undercutting the advantage it is intending to give BIPOC orgs.	REVISION to Section 5.2.3. LAHD will revise this section by deleting the first paragraph in the section that states "In order to qualify for BIPOC points, the proposed general partner or managing general partner must first qualify for maximum points under Section 5.2.1. Applicants who do not receive maximum points under Section 5.2.1, then the applicant shall not be awarded BIPOC points."
74	5.2.2 BIPOC	We suggest LAHD refer to the CDLAC regulations for definition of a BIPOC entity and BIPOC Project instead of having different and potentially conflicting requirements. This streamlines the application process, aligns policies across funding programs, provides greater certainty for developers, and reduces administrative burden.	LAHD is using the definition of BIPOC according to CDLAC regulations.
75	5.2.2	I wanted to provide some feedback and solicit your thoughts around the inconsistency between the LAHD managed pipeline and CDLAC regs as it relates to the BIPOC points criteria. Assuming that the goal is to create pathways for emerging BIPOC developers to qualify for funding, then I'd strongly encourage LAHD to revise the threshold requirement to achieve BIPOC points, by allowing development entities who meet the experience requirements dictated in CDLAC Section 5230(f)(1)(B) or CDLAC Section 5230(f)(1)(C) - see language below - to achieve the extra BIPOC points in the AHMP. The current language in the AHMP only works for well-established BIPOC developers (of which there are an extremely limited number) and the historical challenge in this industry has been lack of access and high barriers to entry resulting from the experience point requirements. The current draft language in the AHMP regs are inconsistent with HCD and CTCAC / CDLAC funding source regulations that specifically have BIPOC language intended to clear some of these historical barriers for emerging BIPOC developers. No emerging BIPOC developer would be able to take advantage of the BIPOC points in the draft AHMP regulations (as written) and also be able to access the BIPOC pool at CDLAC (they would be too experienced).	Same as above.

Q	Section	Question/Comment	LAHD's Response
76	5.2.2	<p>I would strongly encourage the team to revisit the BIPOC regulations in the current draft AHMP guidelines. The BIPOC draft AHMP scoring criteria is inconsistent with the BIPOC regulations at CDLAC and TCAC for Tax-Exempt Bonds and 4% Tax Credits. To qualify for BIPOC points, the current AHMP draft regulations require the applicant to be "awarded max points under GP Experience" otherwise it is ineligible to receive BIPOC points. An extremely limited number of BIPOCs meet this threshold. Additionally, under this structure, the BIPOC entity would not ever be eligible for the significantly less competitive BIPOC pool at CDLAC because they have a max experienced partner in the deal. The CDLAC BIPOC regulations create two paths for BIPOC developers: 1) In which an emerging BIPOC developer can partner with a max experienced developer and be eligible for increased developer fee as a means of compensating the max experienced partner for partnering with the emerging developer, and the increased risk of fronting guarantees and other capital in the process -- this project would compete in the general CDLAC pools and 2) a path in which the emerging BIPOC developer themselves can qualify to achieve max experience points, as long as they have demonstrated the requisite development experience on a LIHTC project that has achieved C of O -- this project can compete in the BIPOC specific pool. These provisions create tangible pathways for BIPOCs who demonstrate the development capacity to equitably compete for funding and reduce barriers to entry. I recommend (in addition to the language already crafted) adding provisions in the AHMP BIPOC regulations that align with those of CDLAC, such that an emerging BIPOC sponsor would have the ability to both obtain AHMP funds and compete in the significantly less competitive BIPOC pool for bonds. In a world in which tax exempt bonds are a scarce resource, this is better for the City of LA and it is better for emerging BIPOC affordable housing developers -- of which there are very few and the ones who know what they are doing are providing concrete feedback based on actual challenges faced in an industry with very high barriers to entry.</p>	Same as above.

Q	Section	Question/Comment	LAHD's Response
77	5.2.4	<p>The proposed language in Section 5.2.4(iv) is vague and drifting towards being more restrictive than CTCAC, CDLAC and HCD. In its February 2021, Affordable Housing Managed Pipeline Regulations, LAHD adopted 10325 (c)(1)(B)(i) in full, which allowed Property Managers to have either abundant experience with California LIHTC projects of any housing type OR a minimum threshold of experience with California LIHTC projects of the Special Needs Housing Type. CTCAC and CDLAC have not changed these requirements in the current regulations. In LAHD's 2022 regulations, the minimum threshold of experience with California LIHTC projects of the Special Needs Housing Type is unclear. Instead the language says, "in order to garner points under this category, applicants for Special Needs/ Homeless projects shall include special needs/ homeless projects in their experience list." Question: How many Special Needs/ Homeless projects should the Property Manager manage and how long should that project have been in service? CTCAC, CDLAC, and HCD all enumerate a specific number of projects in service for a specific number of years. HCD in its MHP Guidelines Section 7302 (e)(5)(C) (C) is the most restrictive with, "The property management agent must have at least one (1) year of experience managing a project with Units restricted by a public agency to a Special Needs Population."</p>	<p>REVISION, LAHD will revise Section 5.2.4 as follows: For special needs housing type projects only applying through the Nonprofit set-aside or Special Needs set-aside only, points are available as described above or as follows:". As a lender in the majority of these projects, LAHD elects to use stricter guidelines regarding General Partner and Property Manager experience.</p>
78	5.2.4	<p>The proposed language in Section 25.2.4(iv) is unclear and potentially more restrictive than CDLAC, CTCAC and HCD. In its February 2021, Affordable Housing Managed Pipeline Regulations, LAHD adopted CTCAC Reg Section 10325 (c)(B)(i) in full, thus allowing Property Managers to have either abundant experience with California LIHTC projects of any housing type OR a minimum threshold of experience with California LIHTC projects of the Special Needs Housing Type. In LAHD's proposed 2022 regulations, we understand that the department requires some experience with Special Needs projects but neither the number of projects nor the project's minimum operating duration is specified.</p> <p><u>Recommendation:</u> Adopt the existing framework from MHP Guidelines, which in Section 7302 (e)(5)(c) states that, "The property management agent must have at least (1) year of experience managing a project with Units restricted by a public agency to a Special Needs Population."</p>	<p>See above.</p>
79	5.3	<p>It appears that the in-text title should be updated to reflect correct sum of scoring for this section as 40, not 36.</p>	<p>Noted. LAHD will ensure that the in-text title is correct.</p>
80	5.3.1.B	<p>This should match the TCAC regs which allow the applicant to look back at several years' opportunity maps. This is important, as maps may change between the time a developer puts a site in escrow and applications are made.</p>	<p>No change. For purposes of scoring, the AHMP program must score projects fairly and therefore must determine an equal point-in-time to determine site eligibility.</p>

Q	Section	Question/Comment	LAHD's Response
81	5.3.1 B and C	Some of our members have recommended awarding higher points for projects in High/ Highest Resource area to further induce its alignment with TCAC goals. Projects which are taking on the higher costs to build housing in these areas could be awarded more for this risk. We recognize, however, that weighting this section too heavily will prohibit some organizations from building affordable housing in lower resource areas where they can afford costs. We appreciate that this is a challenging balance to strike for LAHD.	No change. Per the City's adopted the Assessment of Fair Housing (AFH) plan which sets a goal to increase the stock of affordable housing throughout the City, particularly in neighborhoods of higher opportunity and with access to jobs. The AHMP regulations award points for High/ Highest resource areas as well as Transit Oriented Communities.
82	5.3.1	The Geographic Distribution scoring criteria penalizes HACLA redevelopment projects which are mostly located in economically disadvantaged communities. These properties were sited based on bias and NIMBY-ism by early residents of the City of Los Angeles in the 1940's and 1950's. This policy will perpetuate such NIMBY-ism by not allowing reinvestment in these areas. The following properties are either under active redevelopment or identified to undergo redevelopment under HACLA's 25-year Vision Plan: Rose Hill Courts, Rancho San Pedro, William Mead Homes, Gonzaque Village, Estrada Courts, Imperial Courts, Ramona Gardens, Avalon Gardens, and Pueblo del Rio. Most of these properties are not located within CTCAC's Highest or High Resource Areas, or are located in the lower TOC Tier. HACLA is committed to making every effort to redevelop these existing sites and would request LAHD to provide full points to multi-phase public housing redevelopment projects even if they are not located within the Highest Resource Area or TOC because they are focused on providing equity and place-based investment.	No change. Per the City's adopted the Assessment of Fair Housing (AFH) plan which sets a goal to increase the stock of affordable housing throughout the City, particularly in neighborhoods of higher opportunity and access to jobs.
83	5.3.2	Please confirm that LAHD will accept projects into the managed pipeline without a committed Section 8 PBV award, given uncertainty of upcoming HACLA NOFA schedule. If award isn't secured in time for slotted round, LAHD should allow project to shift to a later round.	No change. HACLA has not announced an upcoming NOFA in 2022 and therefore highly unlikely projects proposing PBV will be ready for the AHMP NOFA timelines. The policy is to incentivize projects with ELI units but not rely on PBVs to make the project feasible. Additionally, projects that apply to HACLA at a later date, will be rescored if the project was awarded ELI points at the time of application.
84	5.3.2	LAHD may consider less restrictive language in this section on Project Based Voucher (PBV) usage. For instance, if a project used PBVs to subsidize a portion of its ELI units, the applicant could receive partial points. This would still encourage less reliance on PBVs, while making it feasible for developers to serve the most vulnerable populations.	See above.

Q	Section	Question/Comment	LAHD's Response
85	5.3.2	<p>If this policy is intended to encourage maximizing extremely low-income units in Family and Senior Projects, it is not clear as to why those ELI units which have project-based vouchers would be excluded from receiving up to 10 points. Any extremely low-income unit should be eligible for maximum points in this category and should not be penalized if they have obtained a voucher commitment, giving the projects an advanced standing in the "Project Readiness Category". HACLA is redeveloping its old public housing properties either through HUD's Section 18 Demolition/Disposition approval or a Section 8 Rental Assistance Demonstration (RAD) conversion or a combination of both. To make the redevelopment financially feasible and viable, HACLA works with HUD in obtaining Replacement Tenant Protection Vouchers or RAD Project Based Voucher funding authority. HACLA's goal is to ensure deepest levels of affordability for the replacement units to ensure its existing tenants, most of whom are in the extremely low and very low income levels category, have the ability and right to return to move back to the redevelopment. Therefore, HACLA projects should not be penalized for ensuring the rights for extremely low income residents to return to the redevelopment through project based subsidy assistance.</p>	See above.
86	5.3.3	<p>HACLA will use every opportunity to add density to its public housing redevelopment projects. However, as stated above, many of HACLA's redevelopment projects have to go through complex discretionary entitlement and environmental review processes, are subject to input from varied stakeholders from the surrounding community, are limited by the configuration and location of the site, connectivity etc. Further, many of the redevelopment projects are multi-phased and the density of each phase will vary depending upon the typology of the building and the masterplan. Therefore, achieving a density of 100 DU per acre is not realistic across all redevelopment projects or within each affordable housing phase. Inclusion of these Site efficiency scoring factor will render HACLA redevelopment projects less competitive for 9% LIHTC.</p>	No change. The goal in awarding points under this section is to further increase production by incentivizing projects with higher densities.

Q	Section	Question/Comment	LAHD's Response
87	5.3.4	<p>Entity understands LAHD's desire to implement cost containment, but have concerns about increasing development costs and the possibility that this section's regulations will be manipulated. Entity is concerned that with this scoring incentive at application, developers will claim lower costs then later seek intervention from the city when costs increase. The "second touch" by LAHD staff is inefficient and change in funding requests makes production planning difficult. We do not believe that the proposed point category will result in the desired outcome of cost efficiency but instead provide an incentive for manipulation. Overall, the scoring for this category should be reduced.</p>	<p>The issue of cost containment is very important to LAHD and the City. The LAHD is focused on fiscal integrity while using public funds. Therefore, as a way to incentivize cost containment, LAHD proposed the Cost Efficiency category. The revision shall be as follows: The Adjusted Total Development Cost is calculated by subtracting the following from the project's Total Development Cost: 1) developer fees, that are contributed as equity to the project, that is in excess of amounts in accordance with contribution threshold as specified in Section 10327(c)(2) (B) of the CTCAC Regulations, and/or 2) any non-residential costs that are required by a government agency as part of the land disposition and are non-zoning related requirements, e.g. replacement parking, etc., up to a maximum of \$40,000 per residential unit, and/or 3) the development cost of the project's commercial component, provided that a) these costs are for viable commercial space, b) costs are supported by private sector financing, and c) costs are excluded from the calculation of basis in accordance with CTCAC guidelines. The average TDC shall be calculated using the total development costs for projects which closed loans between July 1, 2021- June 30, 2022. For the 2022 NOFA, the Adjusted Average Total Development Cost is \$624,777.</p>
88	5.3.4	<p>The cost efficiency category should be eliminated. As someone said during last year's Stakeholders Meeting, this is just asking for competing developers to game the system or lie. Additionally, requirements like this discourage high quality development, encouraging developers to look for cost saving anywhere they can which likely means cutting needed parking and other important amenities and quality standards. This also seems to be in direct conflict with HCID's bonus points for Enhanced Accessibility, high resource and transit-oriented sites, larger family units, etc.</p>	<p>See above.</p>
89	5.3.4	<p>We believe that LAHD faces the difficult question of whether to aid projects with closing gaps, which would reshuffle the original 2021 managed pipeline results, or instead require that projects needing additional funding from LAHD withdraw their TCAC applications and re-apply for the pipeline. There is every reason (based on ample precedent in the City of Los Angeles) to believe that developers with major cost increases will seek the intervention of relevant city council members to increase funding levels, keeping the projects moving forward. For this reason, we think it is in the city's interest to move away from a scoring incentive and impose threshold cost guidelines using a framework based on a large, robust data set.</p> <p><u>Recommendation:</u> Develop a threshold cost framework based on a large data set.</p>	<p>See above.</p>

Q	Section	Question/Comment	LAHD's Response
90	5.3.4	Entity members have also expressed concern about LAHD not subtracting its recast debt from a project's Total Development Costs. If projects with LAHD recast debt cannot use this debt as a committed funding source under Section 5.1.2, they should not also be penalized in a cost efficiency category by having that debt counted against them in the calculation of a project's adjusted total development costs.	No change.
91	5.3.4	LAHD should allow developers to subtract recast debt from a project's Total Development Cost. If projects with LAHD recast debt cannot use this debt as a committed funding source under Section 5.1.2, project will also be penalized in a cost efficiency category by having that debt counted against them in the calculation of a project's total development costs.	See above.
92	5.3.4	Entity recommends removing the proposed language to this section. If projects with LAHD recast debt are not receiving the benefit of such debt under Section 5.1.2, they should not also be penalized in a cost efficiency category by having that debt counted against them in the calculation of a project's adjusted total development costs.	See above.
93	5.3.4	Adjusted TDC should include subtracting land cost. The land value for every site is unique. Projects located in a more desirable area in City of LA will cost more than a less desirable area. As such, including land cost in the cost efficiency calculation incentivizes developers to seek cheaper land in less desirable neighborhoods for affordable housing.	See above.
94	5.3.4	Note that on 4% tax credit projects, line items such as deferred developer fee, MGP capital contribution and capitalized soft loan interest increase the project cost but are typically both a source and a use for the purposes of generating additional eligible basis and therefore, more tax credit equity. These items would need to be backed out of the TDC in order to have an apples to apples comparison.	See above.
95	5.3.4	It would be helpful for LAHD to release its Average TDC Per Unit threshold data before the regulations are finalized to allow an opportunity for public comment. In addition, the cost efficiency category is currently scored quite highly, but the bar developers are expected to meet is still unclear.	See above.
96	5.3.4	Entity also has concerns about when LAHD will release its Average TDC Per Unit threshold data. The cost efficiency category is currently scored quite highly, but the bar developers are expected to meet is still unclear. There will also be no opportunity to publicly comment on this data, because it is set to be released after the regulatory comment period has closed.	See above.
97	5.5	Late arriving cost increases beyond developers' control is causing many Entity members to scramble to fill funding gaps. Inflation and interest rates continue to rise rapidly and supply chain disruptions are causing delays of material delivery. LAHD should be careful about being punitive with its cost containment scoring, because many projects will be struggling with this for the foreseeable future.	As a response to the concern regarding some applicants purposely lowering costs at the time of application in order to garner the highest points, LAHD revised the Negative Points category in 2021. Applicants should approach LAHD prior to the application deadline to determine if negative points are pending.

Q	Section	Question/Comment	LAHD's Response
98	5.5	Section 5.6.1 states that projects will be selected until all credits will be used through Round 1 of 2024. With inflation rates as they are, it is already extremely difficult to predict what construction prices will be in six months let alone two years from now. Given that Section 5.3.4 encourages developers to estimate as low as possible, the negative points should be eliminated or amended to be based at least in part on how far into the future the project starts construction.	See above.
99	5.5.2	LAHD's data set is going to include Adjusted TDC from projects with a construction loan closing between Jan 2020 and NOFA application. However, with the current supply chain issues, rapidly climbing interest rates, shortage in labor, inflation and economic instability, project cost can and will increase more than 11% or might be even more than 15% between application and project's closing. The time between application to project closing can be at least 2 years. The current inflation rate is ~8% already. A project's adjusted TDC increasing more than 15% in the next two years is a large possibility. LAHD should not punish developer's future affordable housing projects because of and global circumstances beyond the developer's control.	See above.
100	5.4	Because this program has mandatory requirements as well as additional features that are expensive to implement, LAHD should allow developers to subtract costs associated with the Enhanced Accessibility Program from Total Development Cost calculations under the Cost Efficiency section (5.3.4). In addition, LAHD should engage the architectural community before finalizing the regulations in this section. Architects have expressed concern that some criteria are very difficult to comply with.	No change. The garner of points through the EAP program is on a voluntary basis.
101	5.4	Because these requirements are implemented by the City, LAHD could consider allowing developers to subtract costs associated with the Enhanced Accessibility Program from Total Development Cost calculations under the Cost Efficiency section (5.3.4).	Same as above.
102	5.4	Entity members have also recommended that LAHD engage the architectural community before finalizing the regulations in this section. We have been told that there are some criteria that are very difficult to comply with.	No change. The EAP program is required by the Voluntary Compliance Agreement entered into by the City and the U.S. Department of Housing & Urban Development in 2019.
103	5.6.2	<p>The current draft regulations call for the following: "In order to maximize utilization of the 9% LIHTC resource and to support production of Permanent Supportive Housing in accordance with the Consolidated Plan, the City will prioritize the goal of always having at least 250 units of Permanent Supportive Housing in the Pipeline, annually, subject to availability of funds and tax credits."</p> <p>Recommendation: The city should consider prioritizing the homeless senior population within the permanent supportive housing goals. The 2020 Los Angeles Homeless Count indicated that there was a 20% increase in older adult homelessness. According to the 2020 Greater Los Angeles Homeless Count 1,953 adults 55 and older were sheltered through Project Room key however this is only intended to be temporary solution while permanent supportive housing is located or built.</p>	TCAC Section 10315(h)- Housing Type goals, limits the set-aside for Senior housing at 15% statewide. Therefore, LAHD will continue to admit only sufficient number of projects into the Pipeline to reasonably use all of the available LIHTCs including capital and operating subsidies.

Q	Section	Question/Comment	LAHD's Response
104	5.6.2	Additionally, it could be helpful if section 5.6.2 could be revised to make senior units eligible for consideration as Supportive Housing. These changes would help to ensure our seniors have the opportunity to age in place within our city and can come in from our streets to a warm home as they grow older.	See above.
105	5.6.4	There are projects proposed in CD5 that are ready, willing, and able to provide additional affordable senior housing units if the funding is made available to them. I (Councilmember) have been briefed on such projects and they will be well suited to serve my constituents and the City as a whole. However, they exceed the minimal 50-unit allocation. I hope that you are able to take this into consideration when considering revisions to the proposed regulations.	See above.
106	5.6.4	LAHD might consider raising its goal for units targeting seniors. The last Los Angeles Homeless Count indicated that there was a 20% increase in older adult homelessness. With age comes additional vulnerability, and as a City we should work especially hard to provide safe affordable housing options for this community.	See above.
107	5.6.4, 5.6.6	I implore LAHD to increase the number of units targeting seniors, as outlined in sections 5.6.4 and 5.6.6 of the proposed regulations, as much as possible and would be most excited to see the 50 unit target increased to at least 100 units.	See above.
108	5.6	We know and appreciate the fact the city is focused on permanent supportive housing. We hope that, given the acute need, the city will prioritize the homeless senior population within the permanent supportive housing goals and funding hierarchy. We look forward to working together on this project. Thank you for the opportunity to provide input in your process.	See above.
109	5.6.6	As LAHD reviews public comments on the proposed 2022 Affordable Housing Managed Pipeline Program Regulations, I would like to take this opportunity to highlight the need for senior affordable housing units within my district, and the City as a whole. Nationwide, the population over 85 years of age is expected to increase by 177% by 2050, according to CBRE Group Inc. and the Los Angeles Business Journal. However, only 8.2% of people over age 75 are in senior housing in Los Angeles and Orange counties, compared to 11.5% nationally according to Bryan Hewitt of Jones Lang LaSalle Inc. Additionally, the California Housing Partnership found in their 2020 Los Angeles County Older Adults Housing Needs Report that three out of every four older adult renter households who earn less than 15% of the area median income are severely cost burdened and spend more than half their income on housing. The demand for affordable housing targeted at seniors is strong, but there is a lack of targeted funding sources for the senior population. The City should use the Affordable Housing Managed Pipeline Program to help address this shortage.	See above.

Q	Section	Question/Comment	LAHD's Response
110	5.6	This requirement puts special needs projects at a disadvantage. For the initial 250 units of supportive housing, please confirm that projects will only be scored against each other for a maximum of 90 points. Following the initial tiers, however, 4% special needs projects would be competing at a disadvantage.	Section 5.6 describes the scoring and selection process. All projects are scored using the same criteria then selection is based on the AHMP's annual goals.
111	5.9	Entity suggests that LAHD formalize a process for providing official letters to projects selected as "alternates." This official letter recognizing applicants as an alternate could still be used by developers to try to leverage other sources and progress along a similar timeline to if they were fully accepted in the AHMP.	No change. LAHD will publish final results which will list the alternate projects. However, issuing a formal letter to alternate projects may disadvantage projects which scored high enough to be formally admitted, and will therefore not issue "alternate project" letters.
112	5.0 General	We support HCIDLA's desire to implement cost containment measures and understand the drive to do so through a scoring incentive as proposed in the regulations. However, Entity like many developers are experiencing major, late arriving cost increases that are beyond our control, and they are scrambling to fill funding gaps. Economic factors such as high inflation, rising interest rates, supply chains shortages and delays, and labor shortages are causing steep increases in prices in very short timeframes. We do not believe that the proposed point category will result in the desired outcome of cost efficiency but instead provide an incentive for manipulation. With this scoring incentive at application, developers will lower costs then later seek intervention from the city when costs increase. The "second touch" by LAHD staff is inefficient and change in funding requests makes production planning difficult. Recommendation: The NOFA should include a supplemental allocation pool of funds, as these funds are important to allow for the start of projects awarded in the prior AHMP.	The current AHMP available budget is reserved for "financing available" as listed in the AHMP regulations and does not include supplemental funding.
SECTION 7 - PROJECT READINESS			
113	7.15	Further, all vacant units in any project produced via the Managed Pipeline (and any other LAHD mechanism) should be specifically required to be posted on the Department's Affordable and Accessible Housing Registry.	LAHD requires all new construction projects to register the project to the Department's Affordable and Accessible Housing Registry.

TENTATIVE TIMELINE - 2022 AHMP NOFA	
<i>Pending City Council and Mayor Approval</i>	<i>TENTATIVE</i>
Publish Final Regulations	August 10, 2022
Open NOFA Application – Tentative	September 8, 2022
NOFA Application Deadline	October 11, 2022
Post List of Applications received	October 17, 2022
Initial Recommendations	December 2, 2022
Appeals	December 16, 2022
Final Recommendation to City Council and Mayor	January 12, 2023