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Odette T. Ramos

November 10, 2017

Kenneth Holt, Secretary
Maryland Department of Housing and Community Development
7800 Harkins Road
Lanham, MD 20706

RE: Additional comments on the draft Qualified Allocation Plan

Dear Mr. Secretary:

Thank you for the opportunity to comment on draft Qualified Allocation Plan.

We have submitted a letter with over 42 organizations signed on regarding the importance of enhancing the nonprofit affordable housing sector in the QAP. We feel very strongly this is one of the most important issues in the QAP, and the best way to preserve affordable housing units in perpetuity. Please include those ideas in this year's QAP.

We are submitting additional comments with this letter:

- CDN is a network whose members provide affordable housing, revitalize communities, and stabilize families across the state. The use of the LIHTC program is important to our members statewide and we encourage DHCD to ensure the program can be used by organizations in areas across the state.
- Section 3.5.1 pertains to family Housing Development – Units Reserved for Persons with Disabilities. We were unable to locate a definition of “Persons with Disabilities” in the QAP. We recommend that a definition of this term be included in the QAP. Additionally, we urge the Department to specify what, if any, certification or documentation a project must have on file (i.e., physician note, referral from other State of Maryland departments) in order to prove that the tenant meets the definition of “Person with Disabilities.”
- Section 3.13.1 pertains to Additional Criteria Applicable Only to New Construction and Gut Rehabilitation. The Department continues to encourage a variety of green certifications, such as LEED and enterprise Green. We request that besides these two certifications, that the Department add “or the equivalent” in order to allow other green certification standards to be eligible. In addition, the Department should consider defining what constitutes a “Gut Rehabilitation” project either or both in terms of dollar amount spent per unit or replacement of major systems (i.e., HVAC, roof).

- Section 4.4.3 pertaining to Family Housing includes a table that is required as per the Settlement. We recommend that the Department only use this table when considering project applications that are within the Settlement's geographic area. For preservation projects, it is, at a minimum, cost prohibitive to create the mix of two and three bedroom units specified in the table for existing projects. The table should only be used for the geographic areas where required pursuant to the Settlement

Please do not hesitate to contact me should you have any questions. I can be reached on 443-801-8137 or odette@communitydevelopmentmd.org

Sincerely,

A handwritten signature in black ink, appearing to read "Odette", written in a cursive style.

Odette Ramos
Executive Director