Commenter	Topic	Comment	Response
CCCI	Tenant buyers	How will tenant buyers access FIHPP funds? Suggest allowing QNP to acquire the property with the intent of transferring the property after a short time to one or more Eligible Tenant Buyers. And allow for technical assistance funding under Section 309 to build capacity for tenant ownership, including collective ownership, of 1-5 unit properties.	Incorporated. Guidelines permit Eligible Sponsors to purchase a property and transfer to one or more Eligible Tenant Buyers. Added building capacity for tenant ownership as a technical assistance service.
CACLTN, CCCI	Tenant buyers	How will tenant buyers prove eligibility and access FIHPP funds?	Guidelines permit Eligible Sponsors to purchase a property and transfer to one or more Eligible Tenant Buyers.
CACLTN	202.3(g) substandard conditions	Add 'or'	Incorporated
CACLTN	300 due diligence costs	Need to be grants or forgivable loans b/c not every project will come to fruition	Incorporated
CACLTN	302 types of funding	clarify language around options for sponsors	Incorporated
CACLTN	302 types of funding	55-year below market interest-rate loan will grow over time and cause a problem for balance sheet	Changed to just "a grant or a loan" to give fund managers flexibility in providing loan terms that work for both them and the recipients.
CACLTN	Sec. 302 Use of "Taken Out" FIHPP funds	clarify intention around recycling of funds	Incorporated
CACLTN	Section 305 Affordability Requirements	Require minimum affordability of 55 years in all cases	This is not consistent with subdivision (b) of Section 50720.8 of the Health and Safety Code.
CACLTN	Section 307.1 Fair Housing Act.	CLTs comply with Fair Housing Law in not excluding persons of protected classes, but may seek to ensure the resident is a good fit for the participatory nature of some CLT properties	No specific action requested/needed
CACLTN	Section 307.2 ADA	some of these laws are only applicable to new construction, to properties with some number of units and greater, to only HUD funded projects, or only to other specific types of properties owned by very large institutions	Incorporated
CACLTN	Section 307.5 prevailing wage	Add TA to GCs into TA RFP. Make "consultants to help with prevailing wage compliance" an eligible FIHPP expense (or FIHPP TA use)	Incorporated.
CACLTN	308 Geographic distribution	Some members think 20% rural is too high compared with pop. Only 45% to SoCal too low.	These targets are just general goals, not mandatory requirements. Not making any change.
CACLTN	309 TA	Add homeownership conversion	Incorporated

Commenter	Topic	Comment	Response
CCCI	200 - Fees	Establish parameters around how funds managers will recoup their costs in the guidelines	Incorporated
CCCI, Enterprise	200 - disbursement of funds	The guidelines should define “encumbered” to clarify whether that requires that the funds have been committed, the loan has closed, or the funds have been dispersed	Clarified funds have been committed to project sponsors for eligible projects.
CCCI	201.6 TA	Many IFMs have the ability to provide TA; allow them to be eligible to receive funding to provide TA	Nothing prohibits organizations that are chosen to serve as IFMs from also applying to be part of the TA provider team.
CCCI	201.6 criteria for capacity building grants	Make the standards more specific	Capacity building grants were removed from the program, as they are not explicitly authorized by statute.
CCCI	300 - repayment of eligible costs	It’s not clear what the intent of this provision is or what costs are eligible.	This provision was removed from the final guidelines.
CCCI, Self-Help, NCST (single-family only)	303 - max funding amounts	$450,000 for multi-family and $550,000 for single-family is too low in some regions, including the Bay Area, for example. In these high-cost markets, HCD should create an alternative maximum that is tied to the median sales price in the county. We would recommend adjusting these factors based on regional geography or provide a clear mechanism for waiver of these limits to account for differing markets.	Changed maximums to $500,000 for multi-family, $600,000 for single-family
PSBPL	303 - max funding amounts	maximum funding amount per unit should be increased to $500,000 for multi-family properties.	Incorporated
CCCI	305 - affordability requirements	specify who will do long-term compliance monitoring	Incorporated
CCCI	400 - QNP application process	specify the minimum information that is expected to be collected on the application	Incorporated
CCCI	400 - QNP application process	timeline for IFM approval or denial should be premised on the receipt of an application that the IFM determines is complete	Incorporated
CCCI	400 - loan application process	IFMs are tasked with developing application forms for QNPs and CBNPs to apply for loans. To the extent possible, IFMs should be permitted to use existing forms and apply their existing review process.	Changed guidelines to direct the AFM to work with IFMs to create a consistent set of forms.
CCCI	503.1 quarterly reporting	consider semi-annual reporting	Changed to quarterly for year 1, semi-annually after that until all funds committed, annually after that.
County of Santa Clara	200 - # of AFMs	clarify # of AFMs	Guidelines clearly state "one AFM." Followed up with County to answer their question.

Commenter	Topic	Comment	Response
County of Santa Clara	201.6 TA providers	are AFM/IFM eligible to become TA providers?	Yes. Followed up with County to answer their question.
County of Santa Clara	202 eligible units	increase eligible units to 40	Followed up with County that 25-unit limit is in statute
County of Santa Clara	202 eligible projects	add projects with ELI/VLI renters	The intent of statute is to limit FIHPP acquisitions to properties that are at immediate risk of foreclosure. While some projects that serve ELI/VLI renters may be at immediate risk of foreclosure, many others may not be.
Enterprise	geographic distribution	build a process to assess the geographic distribution of projects prior to disbursing the second tranche of $100 Million to the FIHPP AFM. The AFM should be required to provide HCD with an assessment of the FIHPP portfolio and pipeline of projects, and HCD works in partnership with AFMs to consider adjusting the geographic distribution. The same exercise should be performed prior to the release of each $100 Million tranche.	Incorporated
Enterprise	monitoring	clarify responsibilities, e.g. IFMs to monitor compliance with Project loan/grant requirements until Stabilization, at which time HCD will take over monitoring and compliance of all aspects of the Project.	Incorporated
Enterprise	long-term maintenance	Require 20-year PNA and fully fund replacement reserves	Incorporated
Enterprise, Kate Hartley, LISC Bay Area	long-term maintenance	If IFMs are assigning long-term loans to the Department, Guidelines should touch on how the Department will allow future rehabilitations for Projects that request it and offer the following options for Sponsors: o Sponsors may refinance with Department funds (if available) or withdraw equity and incur private debt to complete needed repairs; o Sponsors may increase overall AMI levels if required to refinance for the purpose of completing necessary rehab work; o Sponsors may aggregate properties and pursue “scattered site” acquisition/rehabilitation programs that extend the useful life of buildings and maintain permanent affordability (e.g., bundling with low-income housing tax credits).	Incorporated several of these options.

Commenter	Topic	Comment	Response
Enterprise	202 - definition of mixed-use	Mixed-use buildings should be eligible provided that the Project meets at least two of the three following criteria: • More than 50% of the Project's square footage • More than 50% of the Project revenue is from residential income is residential. • More than 50% of the Project funding is for residential uses.	Statute limits use of FIHPP funds to residential real property.
Enterprise	201.6 capacity building grants	expand eligible uses to include "or other relevant capacity building activities and expenses as approved by FIHPP TA provider."	Capacity building grants were removed from the program, as they are not explicitly authorized by statute.
Kate Hartley	302 - form of funding	If IFM provides a 0% interest, forgivable loan, then isn't payment forgiven, rather than deferred and due at the end of the term?	Changed to just "a grant or a loan" to give fund managers flexibility in providing loan terms that work for both them and the recipients.
Kate Hartley	302 - form of funding	it's not clear what the "initial FIHPP funds" are that will be repaid.	Reworded to clarify.
SFHAF	Financial sustainability	prioritize properties that either sustainably cash flow, or, for properties with rents plus COSRs that are insufficient to cover property operating expenses plus CBO staffing and overhead, provide CBOs with another form of ongoing assistance, such as an annual asset management fee, that can support the staff needed to manage the rehabilitation and management of the property long-term	Added asset management fee (termed "post-stabilization project management fee" in the guidelines) to the list of eligible COSR expenses.
SFHAF	Financial sustainability	Require or encourage AMI averaging to support long-term cash flow	This is allowed but not a priority. HCD wants to serve ELI/VLI households and will invest in doing so.
SFHAF	Section 305 Affordability Requirements	Change to "No more than 25 percent of FIHPP funds shall be used to support units serving households of Moderate Income	Incorporated
SFHAF	IFM reimbursement	HAF anticipates that many of the projects under the Program will not support debt, thereby limiting our capacity to issue loans and collect fees. HAF recommends a compensation structure for IFMs that either i) allows origination fees to be paid out of FIHPP program subsidy, or ii) sets a flat fee on a per loan basis payable to IFMs out of the $500 million, rather than including the fee in the project underwriting.	Clarified in guidelines that the IFM's transaction costs can be paid out of FIHPP program subsidy, not out of FIHPP administrative costs.

Commenter	Topic	Comment	Response
SFHAF	additional units	We want to confirm that the guidelines would not prohibit redeveloping properties to include additional units (which might require temporary relocation of existing residents).	The guidelines do not prohibit that happening at some point. FIHPP funds cannot be used for that redevelopment, however (only for acq, rehab, COSRs). So presumably the developer would have to find another source of funding to do that (and that other source of funding would have strong guidelines around things like relocation). Responded to HAF answering their question.
SFHAF	TA and IFMs	integrate TA and IFMs, at least partially.	This is already incorporated; IFMs are expected to provide a certain level of "TA" for their projects, funded by their project-level fees.
LISC Bay Area	reimbursement of funds	What are some examples of projects that might have costs covered through this time period? Acquisitions that have already been completed? Early predevelopment work on acquisitions that are brought to IFMs once the program is up and running?	All of the above; responded to LISC answering their question.
LISC Bay Area	loan term (55 years)	55 years doesn't really work for CDFIs to manage… is 55 years needed for prevailing wage? can we find something that works for program goals and is implementable?	Not an explicit requirement of prevailing wage. General intention is to allow the loan to last as long as the affordability requirements. Changed language in guidelines to just say "grant or loan" without specifying required loan term.
LISC Bay Area	Section 305 Affordability Requirements	spell out requirements rather than referring to tax code	Incorporated
LISC Bay Area	Section 400.2 - IFM approval process	For uniformity and monitoring purposes, the AFM should development overall guidance for program policy and procedures, including reasonable flexibility for IFMs to use existing intake, review, and approval processes where possible.	Incorporated
LISC Bay Area	504 program assessment	It may be that the assessment should be within one year of the program launch or after the first 100M has been distributed.	Incorporated
NCST	201.6 TA	make "acquiring software or technology" an eligible use of capacity building grants	Incorporated
NCST, PSBPL	201.6 TA	indicate amount of funding for capacity-building grants when releasing RFP	Capacity building grants were removed from the program, as they are not explicitly authorized by statute.

Commenter	Topic	Comment	Response
NCST	TA provider	It would be useful to clarify the relationship that the TA provider will have with the AFM and IFMs. We believe there should be a strong working relationship between these entities.	Added language calling for the IFMs to work closely with the TA provider.
NCST	TA provider	the TA provider should also help recruit QNPs and CBNPs in order to ensure wide geographic representation.	Will consider for TA Provider RFP.
NCST	Section 202	Properties eligible for FIHPP acquisitions should explicitly include REO properties	Incorporated.
NCST	Section 300	Eligible uses of funds should include expenses in marketing the property for sale. HCD should also clarify that “gap financing costs” for resold properties can cover appraisal gaps or home purchase assistance provided to end-users	Incorporated first part. Clarified to NCST that we already cover gap financing and we are not planning to give down payment assistance; these will be resale-restricted homes.
NCST	Section 309	clarify that assisting CBNP’s with the process of closing on eligible properties is permissible.	Incorporated
NCST	Section 503	If desired, NCST could partner with the AFM or IFMs to facilitate the required reporting.	That is up to the AFM
NCST	Section 504	is critical that the FIHPP program support rehabilitation of single-family (1-4 unit) homes and not just larger multifamily projects. HCD should monitor the program to ensure it is serving the full spectrum of housing forms prevalent across California, and if it is not, should consider establish requirements or goals that funding flow to these types of projects.	Disagree. If this program only served larger multi-family projects, HCD would still consider it a success.
PSBPL	Purpose of program	Add language to emphasize anti-displacement goals	The existing language came directly from statute. Keep as is.
PSBPL	200 fund managers	clarify that AFM is expected to confer with IFMs on potential QNP and CBNPs	Clarified in guidelines that the IFMs are expected to implement the QNP qualification process.
PSBPL	200 fund managers	clarify that AFM will manage but not dictate or modify program goals around income and geographic targets	Incorporated
PSBPL	201.6 capacity building grants	Add "but not limited to." Add "support for partnerships with organizations that do not meet the QNP requirements with those that do, such as legal help with the contract"	Capacity building grants were removed from the program, as they are not explicitly authorized by statute.
PSBPL	201.6 capacity building grants	align this better with the other TA services provided	Capacity building grants were removed from the program, as they are not explicitly authorized by statute.
PSBPL	201.6 capacity building grants	add language around multi-year commitments	Capacity building grants were removed from the program, as they are not explicitly authorized by statute.

Commenter	Topic	Comment	Response
PSBPL	202 eligible projects	add "At-risk buildings defined by and/or identified by a local government"	Incorporated
PSBPL	302 type and term of funding	We appreciate the requirement for IFMs to make predevelopment funding available “expeditiously,” and recommend that the timeline be defined more specifically in the guidelines and/or the RFP for the AFM	Incorporated
Self-Help	201 eligible sponsors	change "primary activity" to "activities include"; add an LLC just for the project	In statute; can't change.
Self-Help	202 eligible projects	townhomes or condominiums with CC&Rs/HOAs under DRE may be too difficult to acquire/rehab under FHIPP	While such properties may be more difficult, we don't want to completely exclude them.
Self-Help	Section 300	add marketing and leasing	incorporated
Self-Help	Section 300	Option Fees can be high, and can be lost without having acquired the property	This is a risk with any acq/rehab funding program.
Self-Help	Section 300	Add "Development Fees"	Added developer fees
Self-Help	reimbursement of funds	Is the date correct?	This provision was removed from the final guidelines.
Self-Help	allowing add'l rehab funds later	May be more practical to allow for an adequate amount contingencies in the budget to begin with	Final guidelines incorporate both approaches.
Berkeley Student Cooperative	Qualified sponsors	Relax requirements around recent dev/acq experience, including for >5 unit properties	Allow staff/consultant experience to meet requirements
CACLTN	Qualified sponsors	Relax requirements around experience with program design and legal documents to ensure long-term affordability. Don't require it for every single type/tenure. Allow hiring of attorney/consultant to meet requirement. Allow staff expertise but not experience (e.g. expertise developed through FIHPP TA).	Allow staff/consultant experience to meet requirements
CACLTN	Qualified sponsors	Likes the CBNP path for orgs with services experience but no dev experience. [implied: don't just allow the partnership option]	Removed CBNP path; Allow staff/consultant experience to meet requirements of Eligible Sponsor
CACLTN, PSBPL, South Bay CLT	Qualified sponsors	CBNP: If orgs were incorporated in last 5 years, allow the experience of their exec staff to be sufficient	Removed CBNP path.
CACLTN	Qualified sponsors	CBNP: Change max unit size to max dollar amount	Removed CBNP path.
CCCI	Qualified sponsors	Provide more detail around the certification process, e.g. will there be an appeal process, what info should be provided to the applicant to explain the basis for denial, whether applicant can resubmit and under what circumstances (E.g. if application is incomplete).	Added language specifying no appeal process, need for complete application before denying, requirement to explain the basis for denial.

Commenter	Topic	Comment	Response
LISC Bay Area	Qualified sponsors	Amend to state "within two weeks of receipt of a complete application."	Incorporated.
Enterprise, LISC Bay Area	Qualified sponsors	Clarify that no additional approval is required from the AFM or HCD after an IFM has approved or denied a QNP application.	Incorporated.
CCCI	Qualified sponsors	AFM should maintain and publish a list of eligible sponsors	Incorporated.
CCCI	Qualified sponsors	Experience in the construction, acquisition and rehabilitation of affordable housing provides sufficient experience and expertise to carry out the objectives of FIHPP. It is not necessary to have converted a market-rate project.	Incorporated.
CCCI	Qualified sponsors	The guidelines require the QNP to provide three years of financial data and other information but provide no standards for evaluating this information. We suggest that the guidelines direct the AFM to develop standards for reviewing this information, consistent with prudent underwriting.	Incorporated.
County of Santa Clara	Qualified sponsors	Increase max # of units for CBNP if they are partnering with experienced developer	Removed CBNP path.
County of Santa Clara	Qualified sponsors	The 1-5 unit distinction doesn't make sense; those projects can be just as difficult, and more costly on a per-unit basis	Removed CBNP path.
Enterprise	Qualified sponsors	The 1-5 unit distinction doesn't make sense; those projects can be the most difficult to own and operate long-term	Removed CBNP path.
Enterprise, Kate Hartley, LISC Bay Area, [NCST generally in support]	Qualified sponsors	Do not separately define CBNPs/QNPs. Instead, build a better "on-ramp." Experience criteria: Lower base criterion for QNP to 1 independent acq/rehab OR partnership on 3 acq/rehabs. If don't meet QNP criteria, need to have an org sustainability/business plan for at least a 5-10 year time horizon approved by TA provider (existing or work with them to build new). After they have approved business plan, can either (partner on 3 acq/rehabs, as above) or secure adequate staff/consultants to fill gaps in QNP criteria (possibly through a FIHPP capacity-building grant); staff/consultants should be in place prior to COE.	Removed CBNP path. Changed base criteria to 2 acq/rehabs (alone or in partnership); added org sustainability/business plan and opportunity to meet Eligible Sponsor requirements with staff or consultants.
Enterprise	Qualified sponsors	Financial/operational criteria: Sponsor may secure adequate staff/consultants to fill gaps in criteria (possibly through a FIHPP capacity-building grant); staff/consultants should be in place prior to COE.	Incorporated.
Enterprise	Qualified sponsors	Allow a "partnership incentive fee" for more experienced orgs willing to partner with less-experienced orgs	Incorporated.
Ginny Madsen	Qualified sponsors	As written, the guidelines would end the proliferation of new emerging CLTs.	Allow staff/consultant experience to meet requirements

Commenter	Topic	Comment	Response
LISC Bay Area	Qualified sponsors	"where both parties equitably share decision-making" - HCD or AFM should set clear metrics about what this looks like for consistency in implementation.	Did not incorporate. Because this is only a preference rather than a requirement, there is less urgency around defining this.
LISC Bay Area	Qualified sponsors	"If the AFM determines that one or more IFMs have not been able to qualify a sufficient number of organizations as QNPs in their geographic area…" - is this the same as the geographic targets (North, South, Rural)?	No it's not; it's the geographic area the IFM will serve. Clarified language.
LISC Bay Area	Qualified sponsors	Shift the 1-5 unit metric for CBNPs to a max dollar amount	Removed CBNP path.
LISC Bay Area	Qualified sponsors	CBNP "The sufficiency of the foregoing qualifications shall be evaluated in the reasonable discretion of the IFM." - recommend AFM develop and document these criteria to have uniformity	Removed CBNP path.
NCST	Qualified sponsors	1-5 unit limit isn't the best metric; consider limiting the number of properties that a given purchaser is renovating at a given time (for less-experienced applicants)	Removed CBNP path.
NCST	Qualified sponsors	5 isn't the right dividing line anyway; 5-unit projects are typically funded using multifamily mortgages that may be less accessible to smaller developers, while 1-4 unit properties are typically funded with single-family mortgages)	Removed CBNP path.
NCST	Qualified sponsors	requirements around program design and legal documents to ensure long-term affordability are unnecessarily restrictive. we recommend that complying with affordability restrictions be an eligible category of technical assistance.	Modified program design experience requirements
NCST	Qualified sponsors	required to have experience managing at least one Affordable Housing Development for at least 24 months. Given that resale to an owner-occupant is an acceptable outcome for FIHPP funding so long as long-term affordability restrictions are met, we think this requirement is unnecessarily and could discourage participation in the program by single-family focused developers	Specified different program management experience for rental vs. homeownership vs. co-ops.
NCST	Qualified sponsors	Concerned that orgs with no development experience can qualify as CBNPs. Require CBNPs to partner *or* to receive TA on acq/rehab	Removed CBNP path.
CACLTN	Qualified sponsors	"commitment to partner on at least three projects" If a first partnership-driven project went poorly, we would want there to be space for an emerging CLT to detach itself from a development partner without breaching a MOU.	Incorporated.
PSBPL	Qualified sponsors	many of the partnerships will be new and it is inevitable that some will not work out well and probably should not be forced to continue to work together. The Guidelines should not require a minimum number of projects for partnerships.	Clarified that this is preferred but not required.

Commenter	Topic	Comment	Response
Richmond LAND	Qualified sponsors	consider ways to align the eligibility definitions and administrative processes within the guidelines to support place-based CLT organizations like ours to mitigate displacement effectively	Incorporated
South Bay CLT	Qualified sponsors	completion of 2 partnerships should be sufficient experience	Incorporated
South Bay CLT	Qualified sponsors	partnership process will include capacity-building	already built in / intended
South Bay CLT	Qualified sponsors	Both parties in a partnership should equitably share project decision-making, and partnerships where the partner with less experience has an option to purchase the property should be preferred	already built in
South Bay CLT	Qualified sponsors	Adequate funding to cover the costs of partnership, including for developer expenses to support emerging nonprofits in these partnerships, so that the cost does not have to be covered by the acquisition subsidy or loan	Added partnership incentive fee (for developer expenses to support emerging nonprofits) as eligible expense.
South Bay CLT	Qualified sponsors	program should create a pool of partners and incubate partnerships	Already part of TA provider RFP
South Bay CLT	Qualified sponsors	Financing should include potential conversions to tenant ownership and should not preclude that from happening. Support tenants interested in community ownership and cooperative models	Already built in
South Bay CLT	Qualified sponsors	Include tenant engagement requirements in all projects: tenant rights education and information about the entire acquisition-rehab process	Did not incorporate; only relevant to some projects.
South Bay CLT	Qualified sponsors	Not exclude tenant stewardship and participation in property management	Doesn't exclude
South Bay CLT	Qualified sponsors	Capacity Building Grants should be able to be parallel as well as sequential	Capacity building grants were removed from the program, as they are not explicitly authorized by statute.
Self-Help	Qualified sponsors	change "equitably share" to "jointly share" b/c more experienced partner is often lead decision-maker depending on what decisions need to be made.	Equitably does not mean equally; not incorporating
CACLTN, CCCI, Enterprise, LISC Bay Area, PSBPL	COSRs	Allow the QNP-owner to hold the COSR, rather than requiring it to be administered by the AFM, with withdrawals approved by the AFM or IFMs, subject to provisions of grant/ loan agreements.	Not incorporating. Too much risk for not enough benefit.
LISC Bay Area	COSRs	If COSR can't live with the sponsor, consider IFM instead of AFM	Fixed language to make it clear that the AFM can contract with IFM to manage COSRs.
CACLTN	COSRs	If COSR does live with FM, make sure the funds can be used to acquire further projects	We want COSR funds reserved for the project to which those funds were committed. Not incorporating.

Commenter	Topic	Comment	Response
CCCI	COSRs	for some projects in lieu of a COSR, the Department should consider allowing additional soft subsidy up front to decrease operating expense	We are already doing this for FIHPP (FIHPP funds can all be soft subsidy and can cover total cost of project)
CCCI, Self-Help	COSRs	consider making eligible projects in which the average across all households is at or below 50% AMI and sizing the COSR appropriately. The current approach would fund the COSR based on only those units that are at or below 50% AMI, but it is difficult to properly size COSRs if not looking at the project's total operating deficit.	Incorporated
Enterprise, Kate Hartley, LISC Bay Area	COSRs	If the project has used more than 25% of COSR in first 5 years, don't by default restrict withdrawals. Instead, Option 1: if project is doing well, AFM and/or HCD can approve use of additional COSR. Option 2: allow increase in AMIs served. Option 3: Allow sponsors to cross-subsidize their FIHPP projects through pooled reserves or AFM-approved draws from other FIHPP-funded projects. Could work in tandem with Option 1 or Option 2.	Incorporated several of these options.
Kate Hartley	COSRs	There is a section in there now allowing increases in AMIs served if project exhausts COSR and is infeasible. Why wait until project is out of money?	Allow projects to begin to increase AMI if they project the project will become infeasible.
Self-Help	COSRs	re: section allowing increased income levels if deemed necessary "The Sponsor may need to provide a property transition/work out plan to show how the property will avoid operating deficits"	"To the minimum extent required for fiscal integrity" addresses this.
Self-Help	COSRs	Tenant income levels often don't fall directly at the target AMI levels but below the target levels so requiring 5% increments may not be practical.	The concept here is that if the project can achieve financial sustainability by increasing rents for its 50% AMI units to, say, rents affordable for households at 75% AMI, we would limit those units to 75% AMI rather than allowing them to go up to 80% AMI.
CACLTN	Rent increases for existing tenants	10% increase is too high. Also need to take into account rent stabilization ordinances.	Incorporated
CCCI	Rent increases for existing tenants	306 - be more restrictive on allowed rent increases. Set limit of 30-40% of household income	Incorporated
CCCI	Rent increases for existing tenants	306 - Rather than an automatic increase in rents for these households, the guidelines should require the Department's approval of rent increases for these households that is based on a showing of financial need to meet long-term financial stability of the project.	It would be an excessive administrative burden for the Department (or the AFM or IFM) to have to approve rent increases. Sponsors have the option to raise rents but are not required to.

Commenter	Topic	Comment	Response
CCCI	Rent increases for existing tenants	add limits on rent increases for over-income households	Incorporated
Enterprise, Kate Hartley, LISC Bay Area	Rent increases for existing tenants	Over-income tenants: Tenant rents stay the same until the anniversary of their lease execution. At lease renewal, rents may go up by 5% per year, until the tenant is paying 30% of income for rent, at which point the rent increase will match the rent increase percentage for other tenants in the building, up to a 5% max.	Incorporated
Self-Help	Rent increases for existing tenants	Over-income units should be subject to same rent increases as income qualified restricted units.	Incorporated
Enterprise, Kate Hartley, LISC Bay Area, PBSPL	Rent increases for existing tenants	Income-qualifying tenants: Rents with households that meet income qualification at the time of Acquisition may be increased up to 5% annually until the designated affordable Rent for the restricted income level for that unit is reached or the tenants' rent as a percentage of household income is 30%, whichever is less.	Incorporated
Ginny Madsen	Rent increases for existing tenants	3% annual rent increase should be enough to meet maintenance costs. 5% is too high.	5% is typical. Not proposing to change.