



CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE

915 Capitol Mall, Room 311
Sacramento, CA 95814
p (916) 653-3255
f (916) 653-6827
cdlac@treasurer.ca.gov
www.treasurer.ca.gov/cdlac

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FIONA MA, CPA
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Governor

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JUDITH BLACKWELL

To: Qualified Residential Rental Program (QRRP) Applicants

From: Judith Blackwell

Date: October 30, 2020

Re: 2020 Expiring Difficult Development Area and Qualified Census Tract Status

On September 24th, HUD published the 2021 Difficult Development Areas (DDAs) and Qualified Census Tracts (QCT) that are eligible for the 30 percent basis boost under the Housing Credit program. The methodology for determining the 2021 metropolitan DDAs relies on new Small Area Fair Market Rents.

New DDAs and QCTs will become effective on January 1, 2021. This means that bond projects located in an area that was a DDA in 2020, but will lose its DDA status in 2021, are still eligible for the basis boost as long as the bond allocating agency receives the completed application for the project by the required deadline.

QRRP applicants should be advised that **December 11, 2020** is the DDA and QCT application submittal due date to preserve the DDA and QCT eligibility as identified in Section 5258(a) of the CDLAC regulations. Upon receipt of applications, CDLAC will issue determinations regarding whether applications are complete prior to the expiration of the current year's DDA status by December 31, 2020. CDLAC will allow 18 months to secure a CDLAC allocation. **In addition, the bonds must be issued or the project must be placed in service within 730 days from the date the complete application is submitted.**

Within each application, applicants must identify in which CDLAC round they plan to request a bond allocation. For expiring 2020 projects, CDLAC will allow applicants and sponsors to request allocation in any of the 2021 competitive rounds where multifamily projects are being considered.

At the time of submission, all application materials pursuant to CDLAC regulations must be submitted. This includes posting of the required performance deposit and Inducement Resolution. Absent the inclusion of all CDLAC required application materials, an application will not be deemed complete. CDLAC will not allow applicants to provide additional information or make corrections to the application from December 12-31, 2020.

CDLAC will provide flexibility in updating documentation originally submitted December 11, 2019 prior to the application deadline of the Specified Round. **Please note: All revised materials must be submitted**

prior to the application deadline of the Specified Round. After December 11, 2020, it will not be possible to add additional units or sites, propose income targeting that is at higher levels than originally submitted, introduce new unit sizes not already included in the project, or to alter the project in such a manner that the original Inducement Resolution would no longer be valid after the application deadline.

To preserve the opportunity to apply for bond proceeds in excess of the amount specified at the time of submittal, a letter must accompany the December 11, 2020 application requesting the ability to apply for up to a 20% increase in the bond amount as a result of events, either unforeseen or not quantifiable, at the time of submission including, but not limited to, increases in income and rent limits, escalating construction costs and expansion of the scope of work (excluding additional units or sites). To be considered to receive a bond allocation in excess of the original requested amount, documentation including updated application materials, commitment letter and an explanation for the increase must be submitted prior to the application deadline for the Specified Round. CDLAC considers that applications for projects where bonds are ultimately issued in excess of the bond amount listed in the initial bond application are complete at the time of the initial application if the application contains an initial bond request amount and is accompanied by a letter requesting the ability to increase the bond amount by up to 20%, subject to the parameters described above.

In keeping with CDLAC's current policies, no penalty aside from the non-refundable \$1,200 initial CDLAC fee will be assessed if projects do not proceed, but a formal withdrawal request will be required in advance of the issuance deadline. Additionally, if a project does not proceed, the performance deposit will be released without penalty upon CDLAC's receipt of a formal withdrawal request.

2020 Expiring DDA/QCT projects **may** have a pending application with TCAC under the 9% Program at the time of the **December 11, 2020** submission to CDLAC. However, if an applicant opts to pursue a CDLAC award of allocation, any 9% application must be withdrawn pursuant to CDLAC Regulation 5182 or no longer pending by the application deadline for the Specified Competitive Round.

You are advised to visit the CDLAC website and/or subscribe to the CDLAC e-mail distribution list to receive additional information as it becomes available. Should you have questions regarding the information, please do not hesitate to contact the CDLAC main line at (916) 653-3255.