

2014
QUALIFIED ALLOCATION
PLAN APPLICATION
WORKSHOP



February 27, 2014



ARCHITECTURAL

Michael Collins
Nikki Porter



Architectural

Agenda

- Architectural Pre-Approvals
 - Optional Amenities
 - Architectural Design & Quality Standards
 - Rehabilitation Standards
 - Payment & Performance Bond
 - Per Unit Cost Limitation
 - Sustainable Communities



Architectural

Agenda (cont'd)

- Architectural Threshold Requirements
 - Required Amenities
 - Rehabilitation Standards & PNA Assessment
 - Site Information and Concept Site Plan
 - Building Sustainability
 - Architectural Design & Quality Standards
 - Accessibility Standards



Architectural

Agenda (cont'd)

- Architectural Scoring Considerations
 - Desirable & Undesirables
 - Community Transportation Options
 - Brownfield
 - Sustainable Developments
 - Historic Preservation
 - Sustainable Communities



Architectural Pre-Approvals

- Optional Amenities
- Architectural Stds
- Sustainable Communities Site Analysis Packet or Feasibility Study
- Payment & Performance Bond Waiver
- Per unit cost Limitation Waiver



Pre-Application Pre-approvals

- Optional Amenities Approval
 - All amenities must meet the criteria set forth in the Architectural Manual.
 - Pre-approval required for deviations from the amenities detailed in the Amenities Guidebook.
 - Requests for approval must include a detailed description of the amenity and how it will benefit the resident population.



Pre-Application Pre-approvals (cont'd)

- Architectural Design & Quality Standards
 - All applications must meet the Architectural Standards contained in the Architectural Manual for quality and longevity.
 - Consideration will be given to additional design options not listed under the Threshold Standard Design Options.
 - Proposals must include a detailed description of the design option.



Pre-Application Pre-approvals (cont'd)

□ Rehabilitation Standards

- Deviations may be taken into consideration if overriding public policy or historic preservation need exists
 - PNA clearly documents that the existing property does not require a comprehensive rehabilitation.
 - Certification from the architect and where applicable, the appropriately licensed project engineer.
 - *Exception – Proposed bond financed projects that are financed by HUD or USDA may request waivers of certain QAP requirements. (see QAP Core page 14 of 35)* 

Pre-Application Pre-approvals (cont'd)

□ Rehabilitation Standards (cont'd)

- Submit waivers at pre-application stage only if the request is for a change that deviates more than 10% from DCA standards. Requests with 10% or less deviation should be submitted with the full application.
 - If the room size, units size, cabinets linear frontage or dimension is at least 90% of DCA requirements a waiver may be granted. Applicant must demonstrate that efforts were taken to meet the minimum design criteria.
 - Existing tax credit projects originally approved with design deficiencies with the exception of code compliance issues may be considered. 

Pre-Application Pre-approvals (cont'd)

□ Payment and Performance Bond

For HOME projects, a waiver may be granted if letter of credit or construction loan is utilized in lieu of payment and performance bond. A waiver will not be considered unless:

- Owner agrees to provide a construction completion guaranty and payment guarantee, secured by a letter of credit from a federally-insured institution with a value of at least 50% of the total construction cost, including profit and overhead; OR
- Owner agrees to secure a construction loan with private financing. GHFA will disburse funds during the construction period, in an amount not to exceed \$10,000 per construction draw.



Pre-Application Pre-approvals (cont'd)

□ Per Unit Cost Limits

DCA will not fund projects that have costs that exceed DCA cost limits unless a waiver is granted.

- DCA will consider requests to waive the limitations stated in the Threshold QAP on a case by case basis.
- Waivers will be considered only for extraordinary circumstances related to a significant economic barrier not typically seen in Georgia tax credit projects.



Pre-Application Pre-approvals (cont'd)

- Sustainable Communities
 - Required at Pre-application Submission
 - EarthCraft Communities: Site Analysis Packet
 - LEED ND: Feasibility Study by LEED AP ND

- Sustainable Buildings
 - Required at Application Submission
 - Owner's Certificate of Participation in DCA's green building for affordable housing training course (2012, 2013 or 2014)



Pre-Application Pre-approvals (cont'd)

- EarthCraft Communities Program Site Analysis Packet
 - Documentation Required at Pre-application
 - Site Analysis Packet as defined by Earth Craft Communities Guidebook is submitted and reviewed by both DCA and Earth Craft Communities administrators at Pre-application.
 - Documentation Required at Application
 - Copy of executed Memorandum of Participation
 - Draft copy of scoring worksheet



Pre-Application Pre-approvals (cont'd)

- Leadership in Energy and Environmental Design for Neighborhood Development
 - Requires Pre-application Submission
 - Feasibility study prepared by a LEED AP ND that evaluated the feasibility of the proposed project meeting LEED ND criteria is submitted and reviewed by DCA at pre-application.
 - Documentation
 - Documentation of the project's registration in the LEED database
 - Draft copy of scoring worksheet
 - Feasibility study prepared by a LEED AP ND



Architectural Threshold Requirements

- Required Amenities
- Rehabilitation Standards
- Accessibility Standards
- Site Information & Concept Site Plan
- Building Sustainability
- Architectural Design & Quality Stds



Architectural Threshold Requirements

(cont'd)

- Project amenities requirements apply to all HOME and LIHTC applications. (see Threshold)
- Standard Site Amenities
 - A community room or building
 - An exterior gathering area
 - An on-site laundry (1 washer & 1 dryer per every 25 units)
- Additional Site Amenities

All properties must include at least two additional site amenities for projects that have 125 units or less. Properties with more than 125 units must include at least four additional Site Amenities.



Architectural Threshold Requirements

(cont'd)

- Unit Amenities
 - HVAC systems
 - Energy Star refrigerators
 - Energy Star dishwashers
 - Stoves
 - Microwaves
 - Powder-based stovetop fire suppression canisters installed above the range cook top or electronically controlled solid cover plates over the stove top burners



Architectural Threshold Requirements (cont'd)

- Additional requirements for Senior and Special Needs projects.
- Optional amenities (pre-application approval)
- Document amenities and upgrades selected from menu boxes in the application.



Amenities Guidebook

- The Amenities Guidebook sets minimum standards for site amenities.
- Photographs show examples of acceptable and unacceptable amenities.
- Optional Amenities Approval requests should demonstrate equivalent quality and detailed plan as outlined in the Amenities Guidebook.

<http://www.dca.ga.gov/housing/HousingDevelopment/programs/QAP2014docs.asp>



Architectural Threshold Requirements

(cont'd)

- Rehabilitation Standards and PNA Assessment
Physical Needs Assessment (PNA) must be included in Application for all rehabilitation projects.
 - Must be performed by a DCA Qualified Consultant in DCA format
 - Required for adaptive reuse projects
 - For historic projects, must include identification of significant character defining features & provide recommendation for retaining these features.



Architectural Threshold Requirements

(cont'd)

- The rehabilitation Work Scope and Construction Budget must include:
 - Replacement of **all** systems that have Remaining Useful Life of 15 years or less
 - Effective Useful Life (EUL) tables
 - Accessibility Checklists (FHA, UFAS, ADA)
 - PNA forms merged into one Excel file
 - Must include 20 year replacement reserve study and no expenditures in first 5 years



Architectural Threshold Requirements (cont'd)

Creating a Work Scope

- Expected Useful Life of the completed property (must exceed Compliance Period or the Period of Affordability by 5 years)
- Minimum per unit rehab hard costs:
 - \$25,000 for all properties
 - DCA's Architectural requirements typically exceed this minimum.
 - The costs of furniture, fixtures, new community buildings, and common use amenities are not included in the minimum amount.



Architectural Threshold Requirements (cont'd)

Creating a Work Scope (cont'd.)

- Accessibility
 - Must meet new construction standards for compliance with UFAS standards
 - This may include moving partitions to accommodate required clearances
- Uniform Physical Conditions Standards (UPCS)
 - This may include significant investment in asphalt paving and concrete sidewalks



Architectural Threshold Requirements

(cont'd)

Creating a Work Scope (cont'd.)

- Sustainability
 - Rehab must meet all applicable architectural standards, building codes, and health/life safety requirements.
 - Georgia Energy Conservation Code &
 - DCA Building Sustainability Threshold requirements
- Environmental Remediation
 - Asbestos, lead, radon, mold, etc.



Architectural Threshold Requirements

(cont'd)

Creating a Work Scope (cont'd.)

- Life Safety Code
 - Must meet new construction standards for:
 - Stairs
 - Handrails
 - Guardrails
 - Smoke detectors
 - Fire alarms &
 - Unit fire separation



work scope format.pdf - Adobe Acrobat

Georgia Department of Community Affairs
Office of Affordable Housing

Rehabilitation Work Scope

PROJECT NAME: _____ YEAR BUILT: _____
 PROJECT LOCATION: _____ UNIT COUNT: _____
 OWNER: _____ GROSS SQUARE FOOTAGE: _____

*** All line items list must be address with either N/A (not applicable) or a description, percentage, quantity, unit, and cost. This form represents the minimum detail of scope that must be reported; additional line items may be added. Quantities and the approximate percentage of demolition or replacement are of utmost importance. These must clearly demonstrate the extent of the proposed work within the context of the entire existing property.

CSI DIVISION	New Format	Old Format	TRADE ITEM	Describe scope: materials, performance specifications	Percentage of total existing to be demoed or replaced	QUANTITY	UNIT (sf, lf, ea, cy, sy, etc.)	UNIT COST	TOTAL (quantity * unit cost)
2	2	2	Demolition						
			site						
			bdg interiors: ceilings, walls, floor, plumbing, HVAC, elec						
			bdg exterior: siding, roofing, gutters, decks, stairs, breezeways						
2	2	2	Unusual site conditions (such as lead, asbestos, mold abatement)						
			lead abatement						
			asbestos abatement						
			mold abatement						
31	2	2	Earth Work						
			regrade for drainage control						
			regrade for elimination of erosion situations						
31	2	2	Landscaping & irrigation						
			sodding/seedling						
			trees, shrubs, and annuals						
			irrigation						
			tree pruning, root removal						
31	2	2	Retaining walls						
31	2	2	Site Improvements						
			fencing						
			exterior amenities construction (list each amenity separately)						
32	2	2	Roads (paving)						
			asphalt paving						
32	2	2	Site concrete (curbs, gutters, & sidewalks)						
			curb & gutter						
			sidewalks						
			video utilities						
33	2	2	Site Utilities						
			water service						
			fire service						
			storm water piping						
			sewer service						
			electrical service						

Architectural Threshold Requirements (cont'd)

- Site Information and Conceptual Site Development Plan
 - Must include the following:
 - Existing structures (if applicable)
 - Site access, buildings, roads, & parking
 - All site amenities indicated in the scoring criteria
 - Wetlands, floodplains, & State waters
 - Current uses of adjacent properties
 - Topographic contours
 - Proposed finish floor elevations



Architectural Threshold Requirements (cont'd)

- Documents Due With All Applications For DCA Resources
 - Color photographs of the property
 - Aerial photographs are required for all properties
Online satellite maps, such as Google Earth and Mapquest, are permitted only if:
 - Pictures are current (w/in 6 mths of application date)
 - High resolution
 - Clearly identify existing property & adjacent land uses
 - Approximate property boundaries must be marked
 - Black and white photographs are not acceptable



Architectural Threshold Requirements (cont'd)

- Site Selection Considerations
 - Environmental Issues
 - Noise
 - Flood Plains/Wetlands/State Waters
 - Community Transportation
 - Desirable & Undesirables



Architectural Threshold Requirements

(cont'd)

□ Building Sustainability

- All applications (new construction AND rehabilitation) must meet the Georgia State Minimum Standard Energy Code (International Energy Conservation Code).
- Meet the requirements for Measured duct and building envelope leakage
- All appliances must have an Energy Star rating.
- Refer to Section XVII Building Sustainability and the Architectural Manual.

<http://www.dca.ga.gov/housing/HousingDevelopment/programs/QAP2014docs.asp>



Architectural Threshold Requirements

(cont'd)

□ Architectural Design & Quality Standards

- All properties, both new construction and rehabilitation, must meet the requirements as published in the 2014 Architectural Manual.
- Architectural standards have incorporated State, Local Codes, Life Safety and State Energy Codes;
- Uniform Physical Conditions Standards (UPCS)
- All projects must exceed all applicable codes and property standards.
 - Refer to Section XIX(B) standard design option for all projects, to choose from the design options.



Architectural Threshold Requirements (cont'd)

Reference Manuals

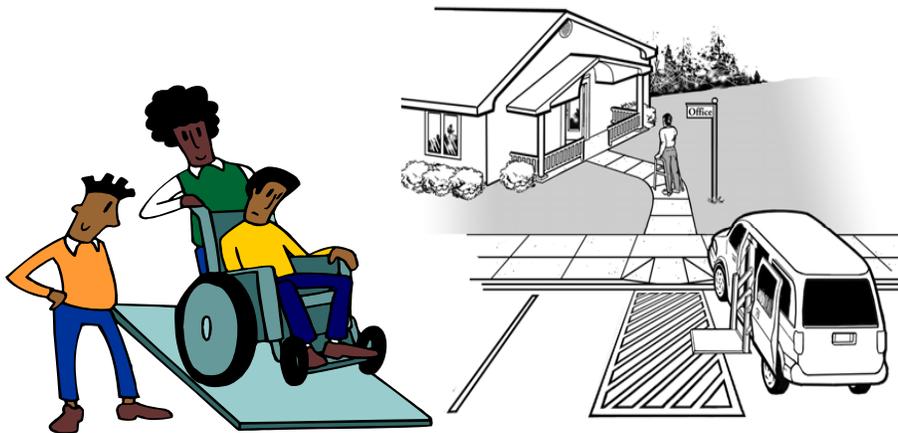
- Architectural Standards
- Rehabilitation Guide
- Amenities Guidebook
- Accessibility Manual
- Environmental Manual
- Home Projects/Additional HUD requirements

<http://www.dca.ga.gov/housing/HousingDevelopment/programs/QAP2014docs.asp>



Accessibility Standards

- Accessibility Standards
- DCA Accessibility Statement
- Accessibility Compliance
- Accessibility Governing Regulations



Accessibility Standards (cont'd)

□ DCA Accessibility Statement

- All projects that receive allocations or funding under the Plan must comply with all applicable Federal and State accessibility laws including but not limited to:
 - The Fair Housing Amendments Act of 1988,
 - Americans with Disabilities Act,
 - Section 504 of the Rehabilitation Act of 1973,
 - Georgia Fair Housing Law and
 - Georgia Access Law as set forth in the 2014 Accessibility Manual.



Accessibility Standards (cont'd)

□ DCA Accessibility Statement (cont'd)

- When two or more accessibility standards apply, the applicant is required to follow and apply the most restrictive so that a maximum accessibility is obtained.



Accessibility Standards (cont'd)

□ Project Accessibility Requirements

- At least 5% of total units (but no less than 1 unit) must be equipped for mobility disabled, including wheelchair restricted residents. Roll-in showers must be incorporated into 40% of mobility equipped units (but no fewer than 1 unit);



Accessibility Standards (cont'd)

□ Project Accessibility Requirements (cont'd)

- At least an additional 2% of total units (but no less than 1 unit) must be equipped for hearing and sight-impaired residents.
- DCA does not distinguish between new construction and rehabilitation activities regarding accessibility requirements. This may include moving partitions to accommodate required clearances.



Accessibility Standards (cont'd)

- Accessibility Compliance
 - Each project selected for allocation is required to retain a DCA qualified consultant to monitor the project for accessibility compliance.
 - The consultants must perform a pre-construction plan review and inspect the project at least 3 times during construction to monitor grading operations, framing, and final compliance.
 - Any exemptions to the applicable federal, state and local accessibility laws must be supported by a legal opinion that supports such exemptions.



Accessibility Standards (cont'd)

- Architectural Design & Quality Standards
 - Federal Fair Housing Amendments Act of 1988
 - <http://www.huduser.org/>
 - Section 504 of the Rehabilitation Act of 1973
 - <http://www.access-board.gov/ufas/ufas-html/ufas.htm>
 - The Americans with Disabilities Act
 - <http://www.access-board.gov/adaag/html/adaag.htm>
 - DCA's Accessibility Manual
 - State & local regulations



Architectural Scoring Considerations

- Desirable & Undesirable
- Brownfield
- Historic Preservation
- Community Transportation Options
- Sustainable Developments



Architectural Scoring Considerations

(cont'd)

- Desirable Sites
 - 2 Points each for the following:
 - National big box general merchandise store
 - Hospital (not outpatient centers or urgent care center)
 - Grocery stores (convenience stores not eligible)
 - Traditional town square, county courthouse, or city hall for non metro projects
 - Other Desirables awarded 1 point each



Architectural Scoring Considerations (cont'd)

- Desirables (cont'd)
 - Points awarded for each category **only** once
 - 2.0 mile walking/driving distance from proposed site
 - Points awarded according to type of activities/characteristics
 - See QAP Appendix II Scoring Criteria p. 3 of 30



Architectural Scoring Considerations

Undesirables

Evaluated Based on Proximity and Impact

- Within ¼ mile radius of the proposed site
- Impact to the resident population will be taken into consideration
- One (1) point deducted per activity/characteristic
- Examples:
 - Junkyards
 - Deteriorated housing
 - Unoccupied / unsecured buildings
 - Environmental hazards
 - Extensive mitigation (noise mitigation costs, steep grade changes, etc. see QAP Appendix II Scoring Criteria page 4 of 30)



Architectural Scoring Considerations (cont'd)

- Community Transportation 4 points (*new*)
 - A site owned by the local transit agency which has been strategically targeted to create housing with on site access to public transportation
 - Fixed route and fixed daily schedule



Architectural Scoring Considerations (cont'd)

- Community Transportation (cont'd)
 - Established public transportation stop along paved roads, sidewalks, established pedestrian walkways/ bike trails **(3) points**
adjacent
w/in 800 feet of entrance
 - Fixed route and fixed daily schedule



(2) points
1/4 mile or less

(1) point
1/2 mile or less



Architectural Scoring Considerations (cont'd)

- Community Transportation (cont'd) 2 pts (*new*)
 - Rural Pool Applications demonstrating that a publicly operated/sponsored and established transit service
 - On-call or fixed route and fixed daily schedule



Architectural Scoring Considerations (cont'd)

- Brownfield (2 points)

If proposed development is redevelopment of a Brownfield, as defined by EPA, Georgia EPD or other environmental regulatory agency that has defined the site as Brownfield site and determined applicable residential use cleanup guidelines.

 - Documentation
 - Evidence of designation as a Brownfield site;
 - An opinion letter from an attorney, a PE or PG;
 - Proposed scope of work for cleanup, budget, and timeline.
 - See QAP Appendix II Scoring Criteria p.7 of 30 

Architectural Scoring Considerations (cont'd)

- Sustainable Communities Certification (3 pts)
 - Requires Pre-application Submission
 - EarthCraft Communities: Site Analysis Packet as defined in Earth Craft Communities Guidebook, or
 - Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND): Feasibility Study prepared by LEED AP ND



Architectural Scoring Considerations (cont'd)

- Sustainable Building Certification (2 pts)

Requires Owner's certificate of Participation in DCA's Green Building for affordable housing training course by a direct employee of the project owner dated 2012, 2013 or 2014.

 - Building certification from 1 of following entities:
 - EarthCraft House multifamily (or single family or renovation)
 - Enterprise Foundation's Green Communities
 - US Green Building Council's LEED for Homes
 - National Association of Home Builders Research Center's National Green Building
 - ENERGYSTAR Version 3 certification



Architectural Scoring Considerations

(cont'd)

□ Historic Preservation (2 Points)

A development that includes historic tax credit proceeds and is an adaptive reuse of a certified historic structure (either listed individually on the National Register, or as a contributing structure in a National Register Historic District), or is deemed via a Georgia DNR-HPD approved NPS Part 1- Evaluation of Significance to have a preliminary determination of listing on the National Register.),

- Adaptive reuse is defined as the change in use of a building.
- Must constitute at least 50% of the residential units.
- Slabs, sheds, gazebos, trailers/mobile homes, pavilions, pump houses, barns, garages and single-family homes are not eligible for these points



Architectural Scoring Considerations

(cont'd)

□ Historic Preservation (cont'd) 2 Pts

■ Documentation:

- Documentation on the previous use of the building.
- Documentation of whether or not the building is occupied.
- Narrative of how building will be reused
- Copy of Georgia DNR-HPD and NPS approved Part 1 - Evaluation of Significance
- Preliminary equity commitment for historic rehabilitation credit



Architectural Scoring Considerations (cont'd)

- Historic Preservation 1 Point
 - If property is:
 - A certified historic structure (either listed individually on the National Register), or
 - Listed as a contributing structure in a National Register Historic District, or
 - Deemed via a Georgia DNR-HPD approved NPS Part 1-Evaluation of Significance to have a preliminary determination of listing on the National Register.



Architectural Scoring Considerations (cont'd)

- Historic Preservation (cont'd) 1 Point
 - Documentation:
 - Copy of Georgia DNR-HPD and NPS approved Part 1- Evaluation of Significance.
 - See QAP Appendix II Scoring Criteria, page 22 of 30



FEDERAL COMPLIANCE

Tarolyn Moore
Staci Tillman



ENVIRONMENTAL REQUIREMENTS

Tarolyn Moore



Environmental Requirements

- A Phase I environmental study must be prepared in accordance with the DCA Environmental Manual and must be included in the application.
- In some instances, DCA guidelines will be more stringent than ASTM standards to meet HUD requirements.
 - Non-scope items



DCA Required Documentation

- Environmental Consultant Signature Pages
- Environmental Certification
- Owner Environmental Questionnaire and Disclosure Statement
- Property Log and Information Checklist
- HOME and HUD Environmental Questionnaire
- Proof of Insurance
- Comprehensive Historical Review
 - TDAT – DCA responsibility
- Letters of Reference
- Professional Credentials
- Record and Communications and Interviews
- Photographs



Things to Watch

- ASTM 1527-13
- Timelines
- Formatting
- DCA Non-Scope Items
- Current Letters of Reference
- Purpose Statement
- Professional Opinion Requirements
- Signing and Reviewing the Documentation
- Phase II Reporting



ASTM 1527-13

- Changes to ASTM 1527-05
 - Re-issued 12/30/13
 - Largely editorial
 - Standard remained substantially the same
 - Reflect current marketplace practices



ASTM 1527-13 (cont'd)

- Significant Changes
 - REC Definition
 - Narrowed to exclude a release inside a building
 - HREC/CREC
 - ControlledREC – new term for closed RECs managed under a Activity and Use Limitation (AUL)
 - Review of Title and Judicial Records
 - Ensures that Title companies are searching judicial records for AULs



ASTM 1527-13 (cont'd)

- Significant Changes (cont'd)
 - Regulatory File Reviews
 - Provide greater detail for rationale for when a regulatory file review is or is not warranted
 - Vapor Intrusion
 - Language added to ensure that soil vapor is considered in the evaluation of RECs or other environmental concerns



Timelines

- The timelines in the Manual are key!
- Phase I and/or Phase II Report (including, but not limited to, regulatory database reviews, interviews, and searches for recorded environmental liens) must be completed less than one hundred eighty (180) days before Application submission. The EP must review and sign both the Phase I and II Reports.



Formatting

- The Phase I report must be in the required format!
 - Ease of internal review
 - Quick response to Applicant



DCA Non-Scope Items

- Asbestos
- Mold
- Lead-Based Paint
- Lead in Drinking Water
- Noise
- Radon
- PCBs
- Floodplains, Wetlands, State Water



Noise

- All new construction and rehabilitation projects must meet the DCA requirements for sound:
 - 45 dB for interior locations
 - 65 dB for exterior locations
- Sources of noise – site is within:
 - five (5) miles of a civil airport;
 - fifteen (15) miles of a military airfield;
 - 1000 feet of a major highway or busy road with greater than 10,000 average daily traffic count;
 - 3000 feet of a railroad or rail line.

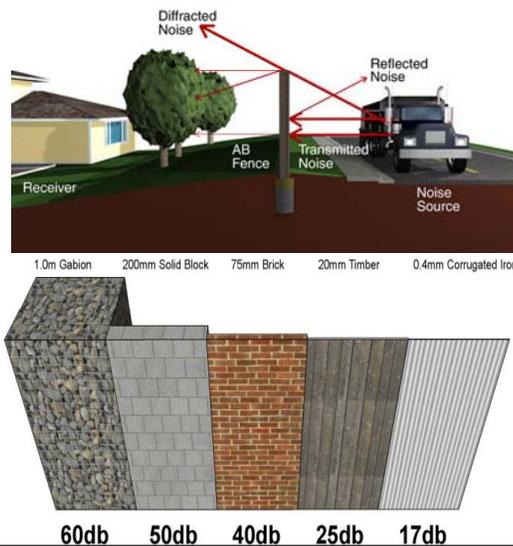


Noise (cont'd)

□ Undesirable Scoring

Extensive mitigation costs

- Threshold:
75 dB maximum
- Adequate nbr of
NAL
- 10 yr noise
projections



Floodplain, Wetlands & State Waters

- Avoid developments in floodplains and wetlands
- Avoid adverse effect to floodplains and wetlands
- Require the observance of all federal, state and local wetland and waters buffers
- 8-step process for HUD funded projects



Floodplain, Wetlands & State Waters (cont'd)

- Executive Order 11988 Updates
 - Effective 12/16/13
 - Language Clarified
 - Regulatory Changes
 - Prohibition of New Construction in Coastal High Hazard Areas
 - Use of Preliminary Flood Maps and Advisory Base Flood Elevations
 - Broadened Use of 5 Step Process



Floodplain, Wetlands, & State Waters (cont'd)

- Executive Order 11988 Updates (cont'd)
 - 8 Step Process
 - Expanded Floodplain Guidance
 - Site and project alternatives
 - Minimizing impacts
 - Reevaluating alternatives
 - Adoption of review performed by HUD or another Responsible Entity
 - Use of individual 404 Permits issued by USACE in lieu of first 5 steps



Floodplain, Wetlands & State Waters (cont'd)

- Executive Order 11988 Updates (cont'd)
 - USACE regulations, policies and procedures not impacted
 - FEMA contact email change: Fema-r4@fema.dhs.gov
 - FIRM Updated - 2013
 - Cobb
 - DeKalb
 - Douglas
 - Fulton



Professional Opinion

- The Phase I and Phase II Report **shall** contain the opinion of the Environmental Professional and assess the risks related to the site. The report must also provide a recommendation as to whether there is a need for additional investigation to identify any potential contamination, related liabilities, and project clean-up.



Professional Opinion (cont'd)

- Environmental Professional must provide a professional opinion as to:
 - The existence or non-existence of any recognized or suspected environmental conditions.
 - Whether the property has known contamination or is at risk for contamination.
 - Whether further environmental assessment activities are necessary.



Professional Opinion (cont'd)

- Environmental Professional must provide a professional opinion as to: (cont'd)
 - Whether further environmental assessment activities are necessary. (cont'd)
 - Whether “all appropriate inquiry,” as described in Section 3.2.6 of ASTM E 1527-13, was conducted.
 - Whether the review of pertinent documents or conditions addressed in each sub-section in Sections 4.0 and 5.0 of the Phase I Report indicates or does not indicate the presence of any recognized environmental conditions.



Documentation

- Environmental Certification
- Owner Questionnaire and Disclosure Statement



ASTM Phase II Testing

A Phase II Report may be required based on the Phase I findings and must be completed as part of the application submittal if recommended by the Environmental Professional.

Must include:

- Thorough documentation of the methods utilized to conduct sampling and research
- Qualified laboratory results with professional recommendations

◆ Fee will be charged



Requirements for Phase II Scope of Work

- The proposed scope of work must:
 - List the recognized environmental conditions, suspected environmental concerns, and/or non scope issues.
 - Specify locations and depth of any proposed monitoring wells, soil borings, and/or samples and include a Site Map showing the same.
 - Specify nbr of samples and depth of samples.
 - Specify test methods and analytical methodology which will be used
 - Include a cost assessment for all Phase II reporting activities
- It is **highly recommended** that Applicant contact DCA before beginning scope of work



Common Errors or Omissions

- Outdated Letters of Reference
- Purpose Statement
- DCA Listed as Other Insured
- Insurance Expiration Date
- Conflicting Site Reconnaissance Dates
- Open Ended Issues



Resources

- Environmental Protection Agency: www.epa.gov
- Final Rule: 40 CFR Part 312
- Your Environmental Firm
- Your Environmental Attorney
- OneCPD Resource Exchange:
<https://www.onecpd.info/environmental-review/>
- Day/Night Noise Level Electronic Assessment Tool:
http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/environment/dnlcalculator
- Tribal Directory Assessment Tool (TDAT):
<http://egis.hud.gov/tdat/Tribal.aspx>
- Web Soil Data (Farm Land):
<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>



Environmental Requirements



Tarolyn Moore
Project Compliance Coordinator
404-679-5271
Tarolyn.moore@dca.ga.gov



ADDITIONAL FEDERAL REQUIREMENTS FOR HOME AND LIHTC

Staci Tillman



Additional Federal Requirements Home & Tax Credit

- Non-Discrimination and Equal Access
(applies to both HOME & Tax Credit)
- Employment and Contracting
(triggered by HOME Funds)
- HOME and Tax Credit Tenant Relocation and
Displacement Policies



Non-Discrimination And Equal Access

- Fair Housing and Equal Opportunity (per applicable civil rights laws and regulations)
 - Can not exclude, deny benefits or subject to discrimination on the basis of race, color, religion, sex, national origin, disability or familial status.
 - Prohibits age discrimination



Non-Discrimination And Equal Access (cont'd)

- Affirmative Marketing (per HOME regulations)
 - Plan to affirmatively market housing must be described
 - Outreach procedures must be adopted
- Accessibility (per HOME regulations, also see DCA manual)
 - Design and construct multi-family dwellings, facilities, and programs accessible to and usable by persons with disabilities



Employment And Contracting

- Employment and Contracting (triggered by HOME)
 - Ensure equal opportunity for employment and contracting
 - Minority/Women's Business Enterprise (M/WBE)
Outreach procedures must be adopted to ensure inclusion to the greatest extent possible. (per Executive Orders 11625, 12432 and 12138)
 - Section 3 (per HOME regulations)
To greatest extent feasible, provide opportunities to low-income persons residing in program area and contracts for work (all types) to be performed in connection with HOME project to business concerns located in or owned by persons residing in the area. 

Employment And Contracting

(cont'd)

- Wage and Labor Requirements
 - Davis Bacon and Related Acts
 - Contract Work Hours and Safety Standards Act
 - Copeland "Anti Kickback" Act
 - All other applicable labor standard provisions and HUD Handbook #1344.1
- Contracting and Procurement Practices
 - Take measures to avoid hiring debarred and suspended contractors



DCA's Relocation Policy & Requirements

- DCA Relocation Manual (For Tax Credits and HOME)
- Uniform Relocation Act (URA)
- Section 104 (d)
- Acquisition



DCA's Relocation Policy & Requirements (cont'd)

Relocation Planning

- Relocation costs can not be funded with DCA HOME Loan
- Tax Credit applicants must disclose in application all other funding sources that may trigger URA or Section 104 (d) requirements, i.e., (HOME, USDA, 515, etc.).
- Any rehab project involving demolition of occupied or vacant property must include the demolition activity in the relocation plan.



Application Submission Requirements

- ALL rehabilitation projects must submit a Tenant Household Data Form for every unit to be rehabbed.
- Proof-DCA requires that the General Information Notice (GIN) notice be given prior to the submission of the Application for HOME projects.



Application Submission Requirements (cont'd)

- DCA seeks to minimize displacement of existing tenants for ALL Tax Credit projects. If applicable and absolutely unavoidable, a detailed project specific Relocation/Displacement Plan and Budget must be submitted in the application-although not Federally assisted, must meet requirements of the Uniform Relocation Act.

(NOTE: Any displacement of existing tenants is subject to DCA's approval on a case by case basis.)



Application Submission Requirements (cont'd)

- Occupancy History (90 Day Rent Roll)
- Relocation/Displacement Project Spreadsheet
 - Must be used throughout the property rehabilitation process.
- Site Map of Property
 - Provide drawings of current project / buildings / units on the property and proposed mix of units/buildings.



Application Submission Requirements (cont'd)

- DCA Site Relocation Survey
 - Addresses development history and occupancy of proposed project.
 - ALL Projects, both HOME and LIHTC, both new construction and rehabilitation, must submit this. Failure to complete the survey with the Application submission will result in threshold failure.



Tax Credit Notice Requirements

- General Information Notice (GIN)
- Move-In-Notice
- Temporary Relocation Notice
- 90 Day and 30 Day Notice



Tax Credit Notice Requirements

(cont'd)

- Posters
Must post at least one (1) relocation notification poster in the project rental office and one (1) poster in each building.
- NOTE
Failure to follow the DCA requirements for relocation and relocation assistance at a Tax Credit Property will be considered a major instance of non-compliance.



HOME Loan Notice Requirements

- General Information Notice (GIN)
- Move-In-Notice
- Notice of Non Displacement
- Temporary Relocation Notice
- Notice of Eligibility
- 90 Day and 30 Day Notice



HOME Loan Notice Requirements

(cont'd)

- Posters
Must post at least one (1) relocation notification poster in the project rental office and one (1) poster in each building.
- NOTE:
Failure to follow the DCA requirements for relocation and relocation assistance at a Tax Credit Property will be considered a major instance of non-compliance.



Additional Federal Requirements
Home & Tax Credit

Questions?

Staci Tillman (404) 679-3114
staci.tillman@dca.ga.gov

