

## APPENDIX A

### Market Study Standards and Requirements

Section 42(m)(1)(A)(iii) of the IRS Code and Section IV(A)(2) of the 2013 Qualified Allocation Plan (QAP) require market studies for all low-income housing tax credit (LIHTC) allocations. In addition to the requirements of those provisions, Applicants and market analysts must follow the procedures and rules described in this Appendix.

#### I. Market Study Process

- A. **Bid:** The Agency will accept bids from market analysts to perform third party market studies for the 2013 tax credit round between November 13 and December 3, 2012.
- B. **Market Study Fee:** A fee for the market study will be paid by the Applicant at the time of submission of the preliminary tax credit application.
- C. **Assigning Projects:** Upon receipt of the preliminary applications, the Agency will contract with market analysts. The Agency will make its assignments by February 1, 2013. The number of projects assigned will be based upon the following: stated capacity, experience with studies in the LIHTC program, number of preliminary applications submitted, conflicts of interest and the Agency's evaluation of the analysts capacity based on prior studies submitted.
- D. **PMA Designation:** Analysts must provide the Agency with a proposed Primary Market Area (PMA) for review as soon as possible but no later than February 15, 2013. Each site must include a map of the PMA **clearly depicting the census tracts** on the map that make up the PMA. Analysts must use a conservative, market supported PMA delineation and conduct local interviews to determine cultural nuances, geographic factors or other relevant factors. Analysts must describe the methodology and reasoning used to define the PMA. The Agency will respond via e-mail within 48 hours of receipt.
- E. **Analysts Contact with Applicants:** Once the PMA designation is complete, analysts may contact Applicants to ensure they have all the information necessary to complete the market report. Analysts **must not discuss PMA delineations** with Applicants until the study is complete.
- F. **Schedule:**
- after PMA is designated - analysts may contact Applicants regarding general information
- |  |   |
|--|---|
| March 18   | Deadline for the Agency and Applicants to receive a 3-hole punched hard copy of the market study          |
| Synopsis letters are required for projects within the same PMA (DO NOT include project preference) |   |
| April 8  | Deadline for analysts and the Agency to receive any revisions from the Applicants                         |
| April 15   | Deadline for the Agency and Applicants to receive a brief addendum or revised market study, if applicable |
- G. **Process for Revisions to Proposals:** The initial market study must be based solely on information contained in the preliminary application. The revised market study may only vary based on revisions from the Agency or Applicants. The following alterations will be permitted: rent structure, project size, targeting and bedroom mix. The following alterations will not be permitted: change in location and/or project type (i.e. switching from a family proposal to elderly).

## II. Market Study Requirements

A completed market study must include the following information:

### A. Executive Summary

1. A brief summary of the proposed project including the population to be served.
2. The overall vacancy rates for all comparable properties in the PMA and the average vacancy rate for LIHTC projects among those comparable properties. See Section H.
3. A table outlining the capture rates determined in Section G(5)(b).
4. Absorption rate for the proposed project to reach stabilized occupancy of 90%.
5. Conclusions about the strength/depth of the market for the project as proposed, including suggested changes.
6. Any recommendations for altering the proposal if analysts feel the project will not reach stabilized occupancy as proposed. Analysts should provide a table reflecting what would be the new capture rate and absorption rate for the recommendation(s). Analysts should not recommend increasing rents or unit mix changes for the purpose of increasing cash flow.
7. A brief discussion of the long term impact of the proposed project on existing or upcoming LIHTC projects in the PMA.

### B. Project Description

1. Project location
2. Construction type (new construction/rehab/adaptive reuse)
3. Occupancy type (family, elderly)
4. Target income group (LIHTC and market rate, if applicable)
5. Special population target (if applicable)
6. Proposed unit mix including bedrooms, bathrooms, square footage, rents, utility allowances  
Structure type (i.e. townhouse, garden apartment)
7. Existing or proposed project based rental assistance
8. Proposed project amenities (i.e. community building, playground, laundry)
9. Proposed unit amenities (i.e. washer/dryer hookups, dishwasher, etc.)
10. If project is a rehab, include current rental rates, occupancy levels, and proposed scope of work including a dollar amount of investment, if included.

### C. Site Evaluation

1. The market analyst **must** physically visit each site and the PMA.
2. Describe physical features of the site and adjacent parcels. Negative attributes of the site must be described in relation to their possible impact on overall project feasibility. This discussion must reflect any negative curb appeal, any problematic surrounding land uses in relation to marketability, lack of transportation, poor amenities, etc. Only include site related pictures, not the surrounding amenities (e.g. grocery stores, etc.), with a description of vantage points.
3. Include a map clearly identifying the location of the proposed project, identifying the closest shopping areas, schools (not applicable for elderly projects), employment centers, medical facilities and other amenities that would be important to the targeted population. Indicate proximity in miles to the proposed project.
4. Include a map identifying existing subsidized low-income rental housing (LIHTC, Rural

Development, public housing, HUD 202, project-based Section 8) within the PMA. Also include projects “in the pipeline” that have received funding but are not yet complete. Indicate proximity in miles of these properties to the proposed project.

D. **Primary Market Area:** Include a map of the PMA, the description of method(s) used and other relevant information listed in Section I(D) above. Secondary market areas are not permitted for purposes of calculating demand.

E. **Market Area Employment Trends**

1. Employment by industry - numbers and percentages (i.e. manufacturing: 150,000 (20%)).
2. Major employers and anticipated expansions, contractions in their workforces, as well as newly planned employers and their impact on employment in the market area.
3. Labor force and unemployment trends for the PMA since 2000 and, where possible, the county-total workforce figures and number and percentage on both. A narrative analysis of data provided, including discussing the cause for the trend and the overall conclusions. Relate data to the impact on rental housing demand.
4. Analysts should use recent data sources (less than one year old) at the county level (or smaller) where available. Non-traditional data sources are acceptable if identified as such and linked to housing demand.

F. **Community Demographic Data:** Population and household trends from 2000 and 2010 census including annualized changes. Estimates and projections for 2012 and 2015 must be prepared by a reputable source such as Nielsen, ESRI, NC State Demographic Unit or the State Data Center. Compare historical census trends to projected trends. Analysts should provide the reasoning for any disagreements with these projections, along with substitute projections. Both numbers and percentages must be shown for the data below, including annualized growth figures. Please include a narrative description of the data including significant changes and overall conclusions.

1. **Population Trends**

- a. Total Population
- b. Population by age group
- c. Number of elderly and non-elderly (elderly projects only)

2. **Household Trends**

- a. Total number of households, average household size and group quarters
- b. Household by tenure; that is, the number of owner and renter households; if appropriate, breakout by elderly and non-elderly
- c. Households by income and by tenure (elderly proposals should reflect the income distribution of elderly households only)
- d. Renter households by number of persons in the household

G. **Project-Specific Demand Analysis:** Analysts must use the most recent rent and income limits effective at the time market studies (or preliminary applications) are assigned. This information must be obtained from Novogradac’s website (<http://www.novoco.com/products/rentincome.php>).

1. **Income Restrictions:** Market studies must evaluate the proposed project based on the occupancy restrictions indicated in the preliminary application. Analysts should be aware of specific income restrictions in the QAP, such as 25% of qualified units affordable to and occupied by those at 30% of area median income.

The study must include data for each income group targeted by the proposed project as described

in the application. For example, if the proposed project targets households between 40% to 50% of the median income and households between 50% to 60% of the median income, demand projections using the methodology below must be provided **for each income group and bedroom size**. Additional data deemed by the analyst to provide further explanation should be referenced in an appendix.

2. **Affordability:** Analysts are required to assume no family households are able to pay more than 35% of gross income towards total housing expenses and that no elderly households are able to pay more than 40% of gross income towards total housing expenses. The demand analysis must clearly indicate the minimum income and maximum income range for each targeted group.

For the maximum household income for one bedroom units the analyst must use the average of one and two person households. For three bedroom units the analyst must use the average of four and five person households. This applies to family projects. For elderly projects, the analyst must use a maximum income based on two person households.

Applications proposing federal project-based rental assistance may only include one demand calculation. The demand analyses must be without the rental assistance. Analysts are required to use the lesser of maximum allowable tax credit rents or the proposed project rents based on income targeting designated in the application.

For proposed projects with market rate units, the analyst must make some reasonable determination of a maximum income level beyond which a household would not likely be a participant in the rental market. The analyst must clearly state the assumptions used in making this determination.

3. **Demand:** Demand must be derived from the following sources below using data from a reputable source such as Nielsen, ESRI, NC State Demographic Unit or the State Data Center.
  - a. **Demand from New Renter Households: Calculate demand from new income qualified renter households in the PMA.** This must be determined by using the current base year of 2012 projected to 2015.

Households projected must be limited to the age and income cohort. The demand for each income group targeted (e.g. 50% of median income) must be shown separately.

- Proposed projects targeting elderly households age 55+ must pull data for age 55 and older. Proposed projects targeting elderly households age 62+ or utilizing the RD/HUD elderly designation must pull data for age 65 and older. (The latter corresponds to Census data breaks; interpolation to age 62 is not acceptable).
  - In instances where a significant number (more than 20%) of proposed units are comprised of three- or four-bedroom units, the analyst must refine the demand analysis for those units by factoring in the number of large households (generally 4+ persons).
- b. **Demand from Existing Households:** This source of demand must be derived from the 2010 census or the most recent American Community Survey (ACS).
    - **Rent over-burdened households**, if any, within the age group, income cohorts and tenure (renters) targeted for the proposed project. In order to achieve consistency in methodology, analysts must assume that rent-overburdened analysis includes households paying greater than 35% (general occupancy) or 40% (elderly) of their incomes toward gross rent.
    - **Households living in substandard housing** (units lacking complete plumbing or are overcrowded) must be adjusted for applicable age, income bands and tenure. The analyst must use a conservative, market supported estimate of demand from both households that are rent-overburdened or living in substandard housing.
    - **Income eligible elderly homeowners likely to convert to renting** must not add more than 20% of total demand. For migration purposes in urban markets analysts may add

up to 2% of income eligible senior homeowners in demand calculations and up to 5% for rural markets. Data from the American Housing Survey and interviews with property managers of active projects regarding renters who have come from homeownership must be used to refine the analysis. Include a narrative of the steps taken in arriving at this demand figure.

- Analysts may not use household turnover rates other than for elderly projects.

#### 4. Method

- Demand:** The two overall demand components added together 3(a) and 3(b) above represent demand for the project.
- Supply:** Comparable units (vacant or occupied) funded, under construction or placed in service in 2012 must be subtracted to calculate net demand. Vacancies in projects placed in service prior to 2012 which have not reached stabilized occupancy (i.e. at least 90% occupied) must also be considered as part of the supply. Do not subtract units in existing, stabilized LIHTC properties.
- Capture rate:** calculated by dividing the number of units in the proposed project by net demand. Capture rate analysis must be completed for each targeted income group and bedroom size proposed. The analyst must include a narrative on what the capture rate means for the project proposal (e.g. given the market area, is this the average capture rate or is it one that should cause concern?).

#### 5. Example of Method:

##### a. Demand and Net Demand

	<b>HH at 50% Median Income</b> (min. income to max. income)	<b>HH at 60% of Median Income</b> (min. income to max. income)	<b>Overall Demand</b>
<b>Demand from New Households (age and income appropriate)</b>			
+			
<b>Demand from Existing Households Rent-Overburdened</b>			
+			
<b>Demand from Existing Households Renters in Substandard Housing</b>			
+			
<b>Demand from Existing Households Elderly Homeowner Turnover (if applicable)</b>			
=			
<b>Total Demand</b>			
-			
<b>Supply</b> (As indicated in Section II(G)(4)(b))			
=			
<b>Net Demand</b>			

##### b. Net Demand and Capture Rates

<b>Bedrooms</b>	<b>Total Demand</b>	<b>Supply</b>	<b>Net Demand</b>	<b>Units Proposed</b>	<b>Capture Rate</b>
1 Bedroom at ___% AMI					
2 Bedroom at ___% AMI					
3 Bedroom at ___% AMI					
4 Bedroom at ___% AMI					
Market Rate					
Overall					

**6. Absorption rate** is the estimated time needed to reach 90% occupancy. The absorption rate determination should take into consideration the overall estimate of new household growth, the available supply of competitive units, observed trends in absorption of comparable units and the availability of subsidies and rent specials. The absorption period starts as soon as the first units are released for occupancy. If a comparable project’s absorption rate is unusually rapid, the analyst must research and state the reason.

**H. Supply Analysis (Comparable Rental Projects)**

1. a. The analyst must determine which properties in the PMA are most comparable to the proposed project (Comps - defined as properties similar to the proposed in terms of rents, unit size and amenities in the PMA which can include both market rate and LIHTC properties). Elderly projects cannot be included as Comps for family projects. When including family projects as Comps in elderly proposals, only use “like” units that are directly comparable to the subject. Representative sample/survey of the PMA rental stock should be included in an appendix. Provide the overall vacancy rates for all Comps in the PMA. In the case of proposed rural projects where a sufficient number of Comps do not exist, include data on at least three (3) projects in adjacent markets with similar characteristics.
- b. Separate out LIHTC properties among the Comps in the PMA and provide the overall vacancy rates for such properties. Do not include vacancy data for assisted properties (RHS, Section 8) if the proposed project is not receiving rental assistance.
- c. Analysts should provide an explanation of vacancy rates that he or she feels are not indicative of the market. For example, a Comp may have occupancy problems due to poor management.

Analysts must contact all Comps and indicate the date, the person they made contact with and how contact was made. Indicate all Comps on a map of the PMA.

2. Specifically describe the proposed project’s long term impact on existing or awarded LIHTC properties. For example, the analyst may conclude that lower rents and/or better amenities will likely lead some tenants to relocate to the proposed project. Vague comments such as “may have a limited effect” do not meet this requirement.
3. The following information must be included for each Comp:
  - a. Name, address and phone number of the comparable property
  - b. Photograph
  - c. Breakdown of unit sizes by bedroom count
  - d. Square footage for each unit type
  - e. Monthly rents and what utilities are included in the rent
  - f. Concessions given, if any
  - g. Year built

- h. Description of amenities
- i. Current vacancy rates by bedroom size
- j. Type of affordable housing program, if applicable (i.e. LIHTC, Rural Development, etc.)
- k. Number of units receiving project based rental assistance
- l. If applicable, in rural areas lacking sufficient three or four bedroom rental comparables, provide data on three and four bedroom single-family rentals or provide information on rental trailer homes and single family homes in an attempt to identify where potential tenants are currently living.

The above information must be provided in a comparative framework with the proposed project. For example, in addition to providing a page of information along with a picture for each comparable, the analyst must also provide comparative charts or tables that show such factors as the proposed project's rents, square footages, amenities, etc. as compared to the other projects.

4. If the proposed project represents an additional phase of an existing project, include a tenant profile as well as additional information related to households on a waiting list of the existing phase.
5. The analyst must also provide a description of any multi-family projects in the PMA (not just LIHTC projects) currently under construction or scheduled to begin construction within the year. The following information must be included as available:
  - a. Address/location
  - b. Name of owner
  - c. Number of units
  - d. Unit configuration
  - e. Rent structure
  - f. Estimated date of market entry
  - g. Any other relevant market analysis information

#### **I. Interviews**

Analysts must interview property managers, town planning officials and others with information relating to the demand for the proposed project. The results of these interviews should appear in an appendix at the end of the market study or in the appropriate section of the report.

#### **J. Recommendations**

Analysts must provide any suggestions to the proposal if the analyst feels the project will not reach stabilized occupancy as proposed. If recommended alterations affect demand, include a table reflecting the new capture rate and absorption rate, preferably in tabular format. Refer to Section I (G) for restricted alterations/recommendations.

#### **L. Signed Statement Requirements**

Each study must contain a signed statement which includes the following language:

I affirm the following:

- I have made a physical inspection of the site and market area and that information has been used in the study.
- I have followed the Agency's market study requirements.
- The information included is accurate and the report can be relied upon by the Agency to present a true assessment of the market.
- I understand any misrepresentation of this statement may result in the denial of further participation in the Agency's rental housing programs.
- I have no interest in the project or relationship with the Applicant, developer, ownership entity or application preparer.