

### CHFA Capital Plan Property Assessment - Center Village

#### Property Identification

Center Village  
GLASTONBURY, CT

Total Current Unit Count: 50  
Census Tract: 5203.02  
Connecticut Congressional District: 1

CHFA Property Identification #: 85057D  
Current State Sponsored Housing Program: SH Elderly

This is a single, stand-alone property. As there are no other adjacent properties under common ownership, there are no opportunities for consolidation to achieve greater efficiencies of scale.

#### Property Description

Tenancy Type: Elderly/Disabled  
Structure Type: Low rise (1-4 floors)  
Number of buildings: 9 residential, 1 community hall  
Maximum # of Stories: 1  
Elevator? None

Summary property description:

The Center Village property has 34 efficiency or studio and 16 one-bedroom units. Generally, the property consists of relatively small units. It features amenities such as common laundry, as well as a community room.

#### Current Operating & Capital Needs Status

Aggregate Capital Needs  
(without market enhancements): \$ 1,843,013

Capital Needs per Unit: \$ 36,860

Projected Year 1 (2014) Operating Income: \$ (6,785)

Current operations at the property are projected to generate negative \$6,800 in net operating income (NOI, or revenue after operating expenses) in Year 1 (2014). With incomes and expenses trending at 2% and 3% respectively, which is a standard affordable housing industry convention, the NOI figure decreases annually and this shortfall continues to grow. As a result, the property is not sustainable and cannot adequately address its future basic capital needs, projected to be approximately \$1.84 million (\$36,860 per unit) over the next 20 years.

Owner Comments to Property Assessment:

*Please see Page 9 for Owner Comments*

Current average income relative to  
the Area Median Income (AMI): 22%

	Current Base Rent	Affordability (% AMI)
Studio/efficiency unit:	320	21%
One-bedroom unit:	330	21%
Two-bedroom unit:		
Three-bedroom unit:		
Four-bedroom unit:		
Five-bedroom unit:		
Six-bedroom unit:		

	Proposed Base Rent	Affordability (% AMI)
Studio/efficiency unit:	450	30%
One-bedroom unit:	482	30%
Two-bedroom unit:		
Three-bedroom unit:		
Four-bedroom unit:		
Five-bedroom unit:		
Six-bedroom unit:		

Number of current households that would be  
impacted by the proposed increase in Base Rent: 36

Rental operating subsidy necessary in 2014 to  
generate revenue equal to raising the base rent  
as proposed: \$ 64,251

Total rental operating subsidy necessary  
assuming a turnover-based leasing strategy: \$ 375,456

In order for the property to operate in a sustainable manner into the foreseeable future, the property would benefit from greater revenues. This can happen in one of two ways - either the property could get operating subsidy from the state or federal government, or it could charge higher rents. A higher rent structure burdens low-income households to pay a greater their income for housing and it will require that the property serve tenants with modestly higher incomes.

Currently, base rents are set by the owner of each property, often in consultation with CHFA staff. While there varying definitions of affordability, this study considers a rent which exceeds 30% of a household's adjusted gross income to be burdensome on the household's monthly budget. In the table to the left, the base rent is identified for each unit size. The table also identifies the minimum household income level for which the base rent would be considered "affordable." The household income level is presented as a percentage of the local Area Median Income.

There are strong reasons to keep the base rents low, as low base rents provide affordable housing options for the state's lowest income residents and reduce the burden of operating subsidies on the State budget. However, if the property's revenue stream (including any available operating subsidy and any cross-subsidy from higher income residents) does not cover the cost of actually operating the property, including the cost of ongoing maintenance and capital improvements, the property itself is at risk.

The Capital Plan is intended to identify the real estate needs of the State Sponsored Housing Portfolio. In order to ensure a minimum revenue stream and in order to implement programmatic consistency regarding base rent levels, this analysis assumes that all base rents are adjusted in 2014 to equal the greater of a) the current base rent or b) 30% of the adjusted gross income of a household at 30% of AMI for the applicable household size, provided these levels do not exceed the local market. This base rent adjustment would represent a significant increase for some households. The analysis identifies the number of households that would be affected by such a change and the amount of operating subsidy needed to protect these households. If the owners elect not to raise the base rents as assumed in this analysis, the property is more likely to experience tight operating budgets towards the end of the Capital Plan subsidy period and will be less able to access leverage funding such as private debt.

Protecting the 36 Elderly/Disabled Households at risk in the event of a base rent increase is clearly a major concern. In 2014, the base rent increase creates the need for operating subsidy of \$64,251 to protect these households while generating the revenue equivalent to the proposed increase in the base rent.

This 2014 rental operating subsidy would recur annually, with inflation increases, for the next 20 years if the State determines that, as a policy matter, the property should continue serving households with an income profile equivalent to the current residents at the property. An alternative formulation assumes that, upon turnover, new residents would move in for whom the proposed base rent is affordable and tenant protection operating subsidies would no longer be necessary. This turnover strategy requires less operating subsidy from the State, but also reduces the number of units of housing available to the lowest income residents of the community. The total tenant protection operating subsidy associated with the increase in the base rent assuming that, on turnover, the units are leased to households able to pay the new base rent without assistance is \$375,455.

**Revenue Adjustments Concurrent with a Recapitalization Transaction**

Center Village, continued

Household Income Level	Current Income Mix	Proposed Income Mix
0-25% of AMI	36	36
25-50% of AMI	14	14
50% of AMI or greater	0	0
Total number of units	50	50

With the revenue generated by the increase in the base rent or the provision of an equivalent operating subsidy, the property should operate under a sustainable revenue picture for the foreseeable future. As a result, no additional revenue adjustments from income mixing are recommended in connection with the transaction.

	Pre-Trans. Base Rent	Post-Trans. Base Rent
Studio/efficiency unit:	450	450
One-bedroom unit:	482	482
Two-bedroom unit:		
Three-bedroom unit:		
Four-bedroom unit:		
Five-bedroom unit:		
Six-bedroom unit:		

Rental operating subsidy in the transaction year  
which would be necessary to generate additional  
revenue equal to that generated by income  
mixing: \$ (0)

Transitional rental operating subsidy necessary  
to protect current residents and permit a five-  
year transition to income tier occupancy: \$ (0)

Property used for market reference: Center Village

	Capital Surplus or (Gap)	Total (Gap) Funded by Subsidy inc. Capital & Operating
Current Scenario (excluding transaction costs):	-	(775,639)
Recoverable Grant Scenario:	(1,422,101)	(1,525,420)
CHFA/FHA Scenario:	(544,038)	(696,305)
4% LIHTC Scenario:	(21,720)	(150,142)
9% LIHTC Scenario:	821,910	(88,600)

The Capital Plan analysis considers five scenarios and the prospect under each scenario to address the property's capital and operational needs. Each scenario's capacity to address the property's capital needs is listed to the left, as represented by the Replacement Reserve (RM&R) balance at the end of 20 years. Also at left is the total gap, including both operating subsidy needs and capital subsidy needs, over the 20 year study period.

- The first scenario, the "Current Scenario" assumes the property continues operating as it currently is operated - no material change in the base rent and no implementation of income mixing strategies to shift the property's revenue picture. Consequently, there is no adverse impact on residents or on the opportunity to serve the income demographic currently holding tenancies. The current scenario uses the baseline capital needs as the anticipated capital investment for purposes of identifying the surplus or gap. However, the current scenario - unlike the other four scenarios - does not include any allowance for soft costs (architecture or design, relocation, developer overhead, etc.) or for general contractor overhead and profit (as it is assumed each trade would come to the site independently, without the need for overarching coordination).

- The second scenario, the "Recoverable Grant Scenario" assumes any revenue adjustments described above (i.e., if the analysis suggested an increase in base rent and/or introduction of a mixed-income framework, or the equivalent revenue from federal or state operating subsidy). The Recoverable Grant Scenario envisions a streamlined allocation of funds from the State to the property, implemented with standardized documents and minimal legal or due diligence transaction costs. The Recoverable Grant would be repaid to the State to the extent possible from cash flow. The Recoverable Grant Scenario is most frequently selected when the transaction is too small to warrant the transaction costs associated with alternative financing or if the market is too weak to support debt or equity leverage.

- The three remaining scenarios - "CHFA/FHA," "4% LIHTC" and "9% LIHTC" correspond to three different leverage transaction structures. Each scenario includes transaction costs appropriate to the nature of the transaction. (For example, legal fees in the two LIHTC scenarios are higher than in the CHFA/FHA scenario.) Typically, the CHFA/FHA scenario would generate the least amount of funds for capital improvements and the 9% LIHTC scenario would generate the greatest amount, with the 4% LIHTC scenario falling in between. The CHFA/FHA scenario is a debt-only scenario, using either CHFA or FHA-insured financing. The two LIHTC scenarios assume both debt and a syndication of low income housing tax credits. The 4% tax credits rely on the use of tax exempt bond financing and are generally available when needed. (The analysis assumes that the tax exempt bonds will be used for construction funding in order to generate the tax credits, but may not remain outstanding at the full amount after permanent debt conversion.) The 9% tax credits are a competitive and scarce resource so cannot be assumed to be available for all properties.

**Recommended Transaction and Transaction Assumptions**

Center Village, continued

Recommended Transaction Option:	4% LIHTC	<p>The capital plan recommends using the 4% low income housing tax credit scenario to finance the capital needs at this property. The debt-only scenario leaves significant capital needs unaddressed, while the use of 9% tax credits at this property would be an inefficient use of the scarce 9% resource given the competing needs within the portfolio and within the State as a whole. The 4% LIHTC scenario, however, covers the capital needs appropriately while minimizing the need for State capital subsidies. This analysis has suggested a potential transaction year of 2014 based on a series of criteria outlined in the capital plan report. In short, the transaction year has been informed by the distribution of critical capital needs year-by-year at the property (i.e. roof, mechanical, structural components) and by the need to distribute the timing of capital transaction for properties within the State Sponsored Housing Portfolio over a period of years in order to manage scarce State-wide resources.</p> <p>This property has been underwritten assuming replacement reserve deposits of \$350 per unit per year, assuming debt service coverage is maintained over 1.219 throughout the first 15 years of the new financing, and assuming hard construction capital needs of \$1.84 million.</p>
Recommended Transaction Year	2014	
Replacement Reserve Deposit PUPY:	350	
Debt Service Coverage in Transaction Year:	1.200	
Debt Service Coverage in Transaction Year 15:	1.219	
Pre-Transaction Capital Subsidy Needed:	-	<p>The property is able to cover its capital needs from current replacement reserves through the date of the capital transaction, so no interim State support is needed.</p>
Transaction Capital Subsidy Needed:	21,720	

**Summary of Recommended Transaction**

Under the 4% LIHTC scenario, the property yields \$94,498 in NOI in the transaction completion year, which includes \$350 per unit per year in replacement reserve deposits. After debt service, the property generates \$24,148 in cash flow in the capital transaction's completion year, trending to \$15,385 fifteen years thereafter. Post-transaction, distribution of cash flow is governed by the terms of the transaction documents and, to the extent not restricted by the documents, could be used at the owner's discretion for ongoing capital needs, owner's working capital or the owner's other priorities. The transaction raises \$1,079,000 in debt and \$891,000 in equity. The transaction results in a gap of \$21,000, all of which would need to be covered by State capital subsidy. This compares to a needs gap of over \$775,000 if no transaction takes place at the property and the capital needs are addressed through routine maintenance or a needs gap of over \$1,422,000 if the capital needs are addressed in a consolidated transaction relying entirely on State capital subsidy.

**Summary of Capital Needs & State Subsidy Needs**

Center Village, continued

Immediate Emergency Capital Needs: 0  
 Current Deferred Capital Needs: 0  
 Current Routine Capital Needs: 298,159

The chart below indicates the year-by-year capital investment needs at the property as projected by The Replacement Reserve Report. The chart also indicates the timing of State capital and operating subsidy needs assuming the transaction scenario described above.

Year	Annual Capital Needs (per CNA)	Capital Subsidy		Operating Subsidy		
		Pre-Transaction Capital Subsidy Needs	Transaction Capital Subsidy Needs	Operating Deficit Subsidy Needs	Base Rent Operating Subsidy Needs	Income Mixing Operating Subsidy Needs
2013	298,159	-	-	-	-	-
2014	67,627	-	21,720	-	64,251	-
2015	47,323	-	-	-	58,982	(0)
2016	31,036	-	-	-	53,477	(0)
2017	31,967	-	-	-	47,729	-
2018	33,881	-	-	-	41,728	-
2019	34,898	-	-	-	35,469	-
2020	48,653	-	-	-	28,943	-
2021	37,023	-	-	-	22,141	-
2022	199,404	-	-	-	15,056	-

Year	Annual Capital Needs (per CNA)	Capital Subsidy		Operating Subsidy		
		Pre-Transaction Capital Subsidy Needs	Transaction Capital Subsidy Needs	Operating Deficit Subsidy Needs	Base Rent Operating Subsidy Needs	Income Mixing Operating Subsidy Needs
2023	39,278	-	-	-	7,679	-
2024	40,456	-	-	-	-	-
2025	44,654	-	-	-	-	-
2026	42,920	-	-	-	-	-
2027	52,776	-	-	-	-	-
2028	45,534	-	-	-	-	-
2029	46,900	-	-	-	-	-
2030	599,522	-	-	-	-	-
2031	49,756	-	-	-	-	-
2032	51,248	-	-	-	-	-

**Scenario Pro Formas**

Center Village, continued

**Income and Expense Analysis**

	CURRENT		RECOVERABLE GRANT		CHFA/FHA		4% LIHTC		9% LIHTC	
	Total	Per Unit	Total	Per Unit	Total	Per Unit	Total	Per Unit	Total	Per Unit
<b>2023 ANNUAL INCOME</b>										
Gross Potential Rent	278,118	5,562.36	366,563	7,331.26	366,563	7,331	366,563	7,331	366,563	7,331
Vacancy/Loss	(40,113)	(802.26)	(40,113)	(802.26)	(40,113)	(802)	(40,113)	(802)	(40,113)	(802)
Other Income	5,389	107.78	5,389	107.78	5,389	108	5,389	108	5,389	108
<b>Effective Gross Income</b>	<b>243,394</b>	<b>4,867.88</b>	<b>331,839</b>	<b>6,636.78</b>	<b>331,839</b>	<b>6,637</b>	<b>331,839</b>	<b>6,637</b>	<b>331,839</b>	<b>6,637</b>
<b>2023 ANNUAL EXPENSES</b>										
Operating Expenses	202,243	4,045	218,835	4,377	214,666	4,293	214,666	4,293	214,666	4,293
Replacement Reserve Deposits	78,914	1,578	78,914	1,578	24,908	498	24,908	498	24,908	498
<b>Total Operating Expenses</b>	<b>281,157</b>	<b>5,623</b>	<b>297,749</b>	<b>5,955</b>	<b>239,574</b>	<b>4,791</b>	<b>239,574</b>	<b>4,791</b>	<b>239,574</b>	<b>4,791</b>
<b>2023 NET OPERATING INCOME</b>	<b>(37,763)</b>	<b>(755)</b>	<b>34,090</b>	<b>682</b>	<b>92,265</b>	<b>1,845</b>	<b>92,265</b>	<b>1,845</b>	<b>92,265</b>	<b>1,845</b>
Debt Service	-	-	-	-	65,942	1,319	70,350	1,407	65,942	1,319
<b>2023 CASH FLOW</b>	<b>(37,763)</b>	<b>(755)</b>	<b>34,090</b>	<b>682</b>	<b>26,323</b>	<b>526</b>	<b>21,914</b>	<b>438</b>	<b>26,323</b>	<b>526</b>

**Sources and Uses Analysis**

	CURRENT		RECOVERABLE GRANT		CHFA/FHA		4% LIHTC		9% LIHTC	
	Total	Per Unit	Total	Per Unit	Total	Per Unit	Total	Per Unit	Total	Per Unit
<b>SOURCES</b>										
Hard Debt										
Commercial Debt 1	-	-	-	-	1,147,484	22,950	1,079,985	21,600	1,147,484	22,950
Commercial Debt 2	-	-	-	-	-	-	-	-	-	-
Tax-Exempt Bond	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-
Soft Debt										
Seller Financing/Take Back Note	-	-	-	-	-	-	1,500,000	30,000	1,500,000	30,000
State	-	-	-	-	-	-	-	-	-	-
Local	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-
Other										
From Operations	-	-	28,174	563	45,674	913	45,674	913	45,674	913
Cash Escrows	-	-	480,000	9,600	480,000	9,600	480,000	9,600	480,000	9,600
Grant	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-
Deferred Developer Fee	-	-	-	-	112,395	2,248	120,353	2,407	119,870	2,397
Equity										
GP Contribution	-	-	-	-	-	-	-	-	-	-
LIHTC	-	-	-	-	-	-	891,143	17,823	1,665,712	33,314
Other	-	-	-	-	-	-	-	-	-	-
<b>Total Sources of Funds</b>	<b>-</b>	<b>-</b>	<b>508,174</b>	<b>10,163</b>	<b>1,785,553</b>	<b>35,711</b>	<b>4,117,156</b>	<b>82,343</b>	<b>4,958,739</b>	<b>99,175</b>
<b>USES</b>										
Acquisition Costs	-	-	-	-	-	-	1,500,000	30,000	1,500,000	30,000
Construction Costs	-	-	1,480,388	29,608	1,480,388	29,608	1,496,793	29,936	1,496,793	29,936
Soft Costs - Design & Construction	-	-	170,274	3,405	167,941	3,359	171,833	3,437	171,833	3,437
Soft Costs - Due Diligence	-	-	11,776	236	21,776	436	26,096	522	26,096	522
Soft Costs - Transaction Costs	-	-	48,674	973	128,674	2,573	247,955	4,959	247,955	4,959
Soft Costs - Financing	-	-	48,222	964	142,199	2,844	188,782	3,776	188,058	3,761
Soft Costs - Other	-	-	28,750	575	32,500	650	32,500	650	32,500	650
Soft Cost Contingency	-	-	15,385	308	24,655	493	29,497	590	29,087	582
Reserves	-	-	-	-	50,471	1,009	144,537	2,891	144,832	2,897
Developer Fee	-	-	126,806	2,536	280,987	5,620	300,884	6,018	299,674	5,993
<b>Total Uses of Funds</b>	<b>-</b>	<b>-</b>	<b>1,930,275</b>	<b>38,605</b>	<b>2,329,591</b>	<b>46,592</b>	<b>4,138,876</b>	<b>82,778</b>	<b>4,136,829</b>	<b>82,737</b>
<b>TRANSACTION SURPLUS (GAP)</b>	<b>-</b>	<b>-</b>	<b>(1,422,101)</b>	<b>(28,442)</b>	<b>(544,038)</b>	<b>(10,881)</b>	<b>(21,720)</b>	<b>(434)</b>	<b>821,910</b>	<b>16,438</b>

**Scenario Pro Formas (continued)**

Center Village, continued

**Coverage of Capital Needs Analysis**

	CURRENT		RECOVERABLE GRANT		CHFA/FHA		4% LIHTC		9% LIHTC	
	Total	Per Unit	Total	Per Unit	Total	Per Unit	Total	Per Unit	Total	Per Unit
<b>FUNDS</b>										
Transaction Rehab	-	-	1,142,486	22,850	1,142,486	22,850	1,142,486	22,850	1,142,486	22,850
Capital Needs Funded Using Subsidy	-	-	-	-	-	-	-	-	-	-
Existing Replacement Reserve Balance	480,000	9,600	480,000	9,600	480,000	9,600	480,000	9,600	480,000	9,600
Replacement Reserves	1,534,197	30,684	1,534,197	30,684	484,247	9,685	484,247	9,685	484,247	9,685
<b>Total Funds</b>	<b>2,014,197</b>	<b>40,284</b>	<b>3,156,684</b>	<b>63,134</b>	<b>2,106,733</b>	<b>42,135</b>	<b>2,106,733</b>	<b>42,135</b>	<b>2,106,733</b>	<b>42,135</b>
<b>USES</b>										
Estimated Capital Needs	1,843,013	36,860	1,843,013	36,860	1,843,013	36,860	1,843,013	36,860	1,843,013	36,860
Enhancements	-	-	-	-	-	-	-	-	-	-
<b>Total Uses</b>	<b>1,843,013</b>	<b>36,860</b>	<b>1,843,013</b>	<b>36,860</b>	<b>1,843,013</b>	<b>36,860</b>	<b>1,843,013</b>	<b>36,860</b>	<b>1,843,013</b>	<b>36,860</b>
<b>YEAR 20 REPLACEMENT RESERVE BALANCE</b>	<b>171,185</b>	<b>3,424</b>	<b>1,313,671</b>	<b>26,273</b>	<b>263,720</b>	<b>5,274</b>	<b>263,720</b>	<b>5,274</b>	<b>263,720</b>	<b>5,274</b>

**Subsidy Analysis**

	CURRENT		RECOVERABLE GRANT		CHFA/FHA		4% LIHTC		9% LIHTC	
	Total	Per Unit	Total	Per Unit	Total	Per Unit	Total	Per Unit	Total	Per Unit
<b>OPERATING SUBSIDY</b>										
Base Rent Operating Subsidy Needed	n/a	n/a	375,456	7,509	375,456	7,509	375,456	7,509	375,456	7,509
Operating Deficit Subsidy Needed	775,639	15,513	-	-	0	-	0	-	0	-
Income Mixing Operating Subsidy Needed	n/a	n/a	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
<b>Total Operating Subsidy</b>	<b>775,639</b>	<b>15,513</b>	<b>375,456</b>	<b>7,509</b>	<b>375,456</b>	<b>7,509</b>	<b>375,456</b>	<b>7,509</b>	<b>375,456</b>	<b>7,509</b>
<b>CAPITAL SUBSIDY</b>										
Pre-Transaction Capital Subsidy Needed	0	-	-	-	-	-	-	-	-	-
Recoverable Cash Flow	n/a	n/a	(272,137)	(5,443)	(223,189)	(4,464)	(247,033)	(4,941)	(286,855)	(5,737)
Transaction Capital Subsidy Needed	n/a	n/a	1,422,101	28,442	544,038	10,881	21,720	434	-	-
<b>Total Capital Subsidy</b>	<b>-</b>	<b>-</b>	<b>1,149,964</b>	<b>22,999</b>	<b>320,849</b>	<b>6,417</b>	<b>(225,314)</b>	<b>(4,506)</b>	<b>(286,855)</b>	<b>(5,737)</b>
<b>TOTAL SUBSIDY NEEDED</b>	<b>775,639</b>	<b>15,513</b>	<b>1,525,420</b>	<b>30,508</b>	<b>696,305</b>	<b>13,926</b>	<b>150,142</b>	<b>3,003</b>	<b>88,600</b>	<b>1,772</b>



## Owner Comments

### Center Village

#### Property Assessment

- o Number of buildings is 9 plus community hall (not one)
- o Noted as having no other opportunities to consolidate (would we consider Village Green & Knox Lane Annex, both 1.4 miles away)
- o Can't figure out how to tie the capital needs figure into the CNA performed the RRR?

RECAP Response: The property description has been revised per owner comments. The RRR did not reflect any impact of inflation to the capital needs costs, therefore the annual capital needs figures from the RRR were revised to reflect inflation of 3% per year, starting in 2013.

#### Market Assessment

- o Table 2 page 5 what is the column headings for this table?

RECAP Response: The column headings for this table should be: Property Name; Address; Property Phone Number; Government-Assisted Program; Occupancy Eligibility; Total Units; Total Assisted Units; Total Units Designed for Elderly; Total Units Designated for the Disabled; Total Units with Accessibility Features; Available Bedroom Sizes; Survey Date.

For both Center Village and Knox Lane Annex,

I reviewed the report and wondered if the scenario of a property that sets the rental charge based on the income category (i.e. like it would as a tax credit property) would be considered as an alternate solution. Was considering a situation where all 140 units across three properties had a rental structure that tiered the rents based on a unit split between 25%, 30% 50% and 80% median households

We are trying to presently evaluate a proforma that would use a proposed mix of 24 units for <25% median, 66 units for <30% median, 43 units <50% median, 7 units <80% median. The rental structure proposed, works to tie the base rent to the income category and square footage of the apartment. Will share for discussion once complete if option for consideration?

Question related to elderly housing. If the properties are to use the 4% tax credit would every household have to be 62 and older to be considered elderly housing? The other option I am aware of is one person being 55 and older in at least 80% of the housing. The problem with that model is if the scales ever tip to >20% of the households being young disabled under 55 the property would no longer be elderly. This would be a major concern to the local community.

RECAP Response: Recap encourages property owners to develop their own recapitalization solutions that work for their specific situation, with the Capital Plan Property Assessment to be used as a starting point for discussions internally and with the State. Regarding the elderly housing questions, the low income housing tax credit program does not have any age designations or requirements. Whatever elderly housing restrictions an owner proposes is superimposed on top of the tax credit regulations.