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## 9% LIHTC Qualified Allocation Plan Program Year 2026-2027

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**Date** Wed 8/6/2025 2:58 PM  
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Good afternoon,

I am submitting feedback on the 9% LIHTC QAP on behalf of the City of Toledo Department of Housing and Community Development. DHCD works with many affordable housing developers, including those seeking gap financing on LIHTC projects. The City has completed several large-scale planning processes, including the Forward Toledo Plan, and has designated HUD Neighborhood Revitalization Strategy Areas (NRSAs) in Englewood (43606), Junction (43607), and Old South End (43609). DHCD is also working on a Choice Neighborhood Initiative Planning Grant for Vistula (43604).

The draft 9% LIHTC QAP and map do not align with priorities designed by the City of Toledo and our community partners. The NRSAs of Englewood, Junction, and Old South End do not meet general or senior occupancy thresholds. Several upcoming large-scale projects, including Toledo Public School's Scott Park Campus, also do not fall in areas meeting the threshold. This is unfortunate as these areas have high housing needs, as indicated by the Housing Need Index. Our priority neighborhoods have seen and continue to benefit from extensive City, County, and community investment.

We would request removing the threshold minimum, eliminating the barrier, and allowing all projects to have a chance. We suggest including a rider to overcome a low Neighborhood Opportunity Index score. For example: a project falls in a City or County designated improvement area (i.e., NRSA or CNI); has significant City or County support; and/or relates to a large-scale plan. I would also suggest including a composite score to projects adjacent to census tracts with higher scores, such as tracts 13.03 and 14, with stark scoring differences and no identifiable reason why.

DHCD is excited to see what future projects will happen in Toledo and Lucas County, and we appreciate OHFA for considering our opinions.

Thank you,

**Emily Dellinger, MPA**

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