

Chris Austin

From: David Levy <dlevy@ahmi.org>
Sent: Thursday, August 29, 2019 10:17 AM
To: Chris Austin
Subject: First Draft 2020 QAP Comments

Chris, the following are Affordable Housing Management's comments on the First Draft 2020 QAP:

II.D.2. Limits: Eliminate this section as there is no valid reason for restricting any percentage of the overall allocation to nonprofits.

IV.A.1.(b)(ii) Amenities: During the past couple of years, many potential great development sites have been identified, however, a majority of them do not score the full 38 points due to being slightly over one mile driving distance to one or more primary amenities. Having a site being over a mile by just one or two tenths of a mile should not disqualify a great site and the driving distances should be increased by one half mile for the four distance ranges; i.e., the first range would be 1.5 miles or less, etc.

IV. C.1. Maximum Project Development Costs: The \$78,000 has been in place since 2018. A 2018 development AHM is working on had a four percent increase from the full application to starting construction and I believe that is typical of most developments and projected construction costs are anticipated to continue the upward trend. The \$78,000 maximum should be increased to at least \$82,000 and then following years there should be at least automatic minimum increases for inflation. I believe that is the rationale the agency uses for increases each year it applies to the application and allocation fees and at a minimum, the same should be applied each year for the construction cost limit.

IV.F.8. Tiebreaker Criteria: Do not change the first tiebreaker from last year. Having the first tiebreaker be the lowest amount of credits per unit could potentially encourage developers to cut corners and have an impact on the quality of future developments.

VI.B.7. Developer Fees: Support the proposed increase; however, the same increase should be applied proportionally for rehabilitation projects as the risk is just as high, if not higher.

Draft Appendix B – G.2.: The proposed 18” concrete for a dumpster approach is extreme. 12” is standard on highways (roads). AHM uses an 8” concrete approach in its developments and agree the approach should be concrete, however 8” is adequate.

AHM appreciates the opportunity to provide these comments. Thanks.

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