Chris Austin

From: Wil Warren <blanketcreekllc@gmail.com>
Sent: Monday, October 30, 2017 3:13 PM
To: rentalhelp
Subject: 2018 QAP 2nd Draft Comments

Following up on the conference last week, I wanted to add the comments below for the 2018 QAP 2nd Draft.

- QAP IV.F.2 - Credits Per Unit Average - I would suggest that we keep this section at the same constraints as the 2017 QAP which was 2 points for within 5% of the average and 1 point for within 10% of the average by Geographic Region with the addition of adding a minimum credit per such as $10,000 for the East/Central/West and $10,400 for the Metro.
    - Another consideration would be not taking into account the Redevelopment projects to the average calculation itself since these projects throw the average off and the Redevelopments have their own rule to be awarded no matter what their average credits per unit calculates.
    - The 1st draft 2018 simply narrowed the band for credits per unit average. Cutting the band in half from 5% to 2.5% at this 1st draft QAP, makes the application process even of a lottery to be awarded full points. Since all applications are aimed at the most points possible (i.e. getting the full 2 points in this category as opposed to the 1 point only), assuming this narrow band, a application that is 2.6% off of the average ($260 or so) might as well be considered $500 or more off since they would both be below the full points.
    - The 2nd draft 2018 got expanded the band slightly, but then told us to shoot for slightly below average credits per unit with the most points being awarded between 4-8% below the average. Again, since we are all shooting for the most points possible, at this rule, an application that is 7.9% off of the average scores perfectly but a project that is dead on the average gets less. So at this proposed rule, the aim is slightly below average meaning most everyone will try to be slightly lower in credits per unit which will move the average down, and the full points level will be awarded to those applications that go even further down, not even the ones who are just slightly below. This makes it even more of a lottery in my opinion.
- All things said, I would suggest we keep the average credits per unit rule the same from 2017 since we all have a year of applications under our belt at this rule and can submit realistic numbers to produces the best product for the affordable housing community.

Thanks.

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