Chris Austin

From:	stephen@brockvi.com
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To:	rentalhelp
Subject:	QAP Comment Set #2

My follow up comments after the public hearing on Sept 14, 2017:

*Applicant Bonus Point: I have reconsidered after reading comments and hearing perspectives at the public hearing and now am <u>supportive</u> of this.

*48 unit limit in Small Towns: don't overthink it, it's right enough of the time that it's a good rule. These are indeed places with less than 10,000 people and it is a fitting rule.

*Const costs — some folks commented that they can't keep costs low with smaller developments or smaller markets but the points for being within the average cost per unit is indeed an average, not lowest costs/credits per unit. The points awarded are for being within a range of the average, not the lowest…..smaller deals and any other kind of expensive/inefficient deals contribute to that average.

*Cost per sq ft — I strongly recommend not measuring anything by this. VA uses cost per sq ft metrics and it requires a lot of detailed calcs, tracking and official definitions of gross sq ft vs heated sq ft vs net sq ft. Developers don't really know where they are on related points until they get a set of plans. Architects have to certify sq ft at various points. And then there is compliance to make sure sq ft doesn't shrink after award….it opens a whole new bag of issues and compliance/tracking effort. Also, measuring by cost per sq ft alone fails to recognize that not all sq ft are the same — kitchen and bathroom costs per sq ft are not the same as bedroom, living area, breezeway, balcony etc cost per sq ft. I believe cost per unit metrics are superior and allow developers more freedom to make necessary design and trade off choices. An alternative is to track cost per unit by bedroom type.

*Average Credits Per Unit — please clarify further in the QAP how this is calculated. There are at least two ways to do it.

Regards,

Stephen Brock