

Tara Hall

From: David Levy <dlevy@ahmi.org>
Sent: Thursday, October 12, 2023 4:28 PM
To: RentalHelp
Subject: 2024 Draft QAO

Affordable Housing Management (AHM) has the following comments on the draft 2024 QAP:

Maximum Project Development Cost: AHM agrees with other comments that this is not a good time to bring back the maximum project development cost cap and it should be removed.

Two Bonus Point Option: This should be changed to allow the developer the option to choose to split up the bonus points between two projects or combine the two points to one project. This would allow a developer who is submitting one application to apply two bonus points and other developers would have the option to apply one bonus point to two developments.

Tie Breaker: Include the Census Tract with the lowest poverty rate as the third tie breaker to encourage developers to locate developments in high opportunity areas.

Regarding the draft added third tiebreaker and the date the preliminary applications are due, consider moving the preliminary deadline further out. As it has been, with the holidays, how can applications be submitted any earlier? Will we all be working during the holidays? Also, it does not specify how early it can be submitted, so does this mean there is now a rolling application process? There should be more parameters if this tiebreaker remains, which we disagree with and suggest replacing it with the census tract with the lowest poverty rate.

Nonprofit Set-Aside: Agree with other comments to increase the percent of credits being awarded to projects involving nonprofits.

Exhibit B:

Parking Lot Required Spaces: In addition to the ability to request the Agency to approve less parking than outlined in the QAP (V.F.3.), developers should have the ability to base the number of parking spaces to the local municipality parking space requirements. This would positively contribute to the environment since there would be less impervious surface and storm drainage run off and would require less land and asphalt that will reduce development costs. With the escalating cost of development, this is one thing that can be done to assist with lowering costs.

Awarded Project Plan Requirements: Regarding the added "incomplete plan sets will not be reviewed", with new construction it is difficult to get site lighting & sprinkler drawings in time for Agency review (which is usually before closing), so if the Agency won't even look at a plan set until these other drawings are included, that could significantly delay project timelines. This added language should be deleted.

It would be very helpful if the Agency could provide some way for developers to check to see where in the plan review process their project is at in order to assist with scheduling closing and starting construction.

There isn't clarification on the clear floor space at the kitchen pantry. Is it centered on the door, or centered on the handle (operable part)? Please add a clarification for this.

3BR units now require a step-in shower. Please clarify if this means a low-curb shower and if we are allowed to install a typical tub/shower.

Thank you for the opportunity to submit comments.

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