

## Chris Austin

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**From:** David Levy <dlevy@ahmi.org>  
**Sent:** Friday, October 25, 2019 4:14 PM  
**To:** Chris Austin  
**Subject:** Second Draft 2020 QAP Comments

Chris, if it isn't too late, the following are Affordable Housing Management's comments on the Second Draft 2020 QAP:

II.D.2. Limits: Fully support deleting the limits on nonprofit awards and appreciate this change!

IV.A.1.(b)(ii) Amenities: During the past couple of years, we have identified many great development sites, however, a majority of them do not score full points due to being slightly over one-mile driving distance to one or more primary amenities. A site that is over a mile by just one or two tenths of a mile should not disqualify a great site. Available sites within one mile are becoming harder to find and more expensive. 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. If the agency would rather not increase it by one half a mile, then at a minimum it should be increased by a quarter mile.

Strongly support the recommendation to add Lowes and Home Depot to the list of qualifying shopping establishments.

Also, we agree with the recommendation to allow any pharmacy that sells prescription drugs and over the counter medicines to be counted as a pharmacy.

IV. C.1. Maximum Project Development Costs: We appreciate the proposed increase to \$80,000, however, that amount still does not address higher costs in the Metro region and strongly support the recommendation to have a separate chart A and B for Metro region. Most Metro Region developments experience a 5-7% increase in construction costs from full application to beginning construction. Construction costs are anticipated to continue an upward trend. The \$80,000 should be increased to \$85,000 and then subsequent years there should be at least automatic increases for inflation and other unexpected occurrences. The agency requires increasing annual project operating expenses by 3% and that percentage, at a minimum, should be applied each year automatically to construction costs.

VI.B.7. Developer Fees: Support the proposed increase; however, why isn't the same increase being applied proportionally for rehabilitation projects? It should be.

Appendix B, V. F: Parking: Please consider deferring to local ordinances to determine the amount of required parking spaces.

AHM appreciates the opportunity to provide these comments. Thanks.

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