

Chris Austin

From: Andrew Rosen <rosen@blue22dev.com>
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To: Chris Austin
Subject: QAP comment

Chris

I am in favor of keeping the first tiebreaker as the lowest poverty rate in each census tract. While it may not be a perfect indicator, it at least provides the developer with a greater sense as to where their project stands versus the competition. These are also in areas of most towns which do not have much affordable housing and thus helps to avoid any clustering in less desirable areas.

The 4%-8% credit/unit range makes sense as it allows the developer to budget adequately for the most part. However, as currently configured the developer now needs to be at the absolute lowest number in that range; that does encourage some type of "race to the bottom" though not as significant as in prior years. While there are some areas of differentiation; primarily where you use your bonus point and if you are in a bonus county, for the most part this new tiebreaker is a total crapshoot. Under the prior census tract designation, the developer is at least more in control of their destiny. If one found a tract with a poverty rate of 20% many would pass, but in this scenario, a project with a 40% rate for instance, could easily win.

It is time consuming and expensive enough to put these applications together. A developer could fairly easily make a determination after their initial application as to whether to go forth based on the census tract of their competition; under this scenario we have no idea.

The question is as currently configured a project with a \$1 differential in credit per/unit could easily win over a project with a poverty rate many, many multiples of that. I would think locating in a better area makes more sense than the slightest of differences in credit per/unit.

I would suggest in the future using different tiebreaker criteria such as more points for more amenities for instance. However, for the 2020 plan I feel keeping the first tiebreaker as the same as last year is the most prudent.

Thanks, as always.

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