

From: [Brad Queener](#)
To: [TaxCreditQuestions](#)
Subject: [External] 2022 QAP Comments
Date: Friday, October 15, 2021 3:00:31 PM

Hope all is well. Comments below:

1. Increase \$1,500,000 per developer cap to reflect the current, and likely future development costs. This amount seems to have been carried forward from years ago. Notwithstanding the past year, costs have and will continue to increased.
2. The Authority needs to, perhaps not in this QAP, address the aging LIHTC stock in the state via a larger allocation of LIHTCs to the rehabilitation pool
3. Remove the CORES requirement in its entirety and allow for more detailed conversation for a following years QAP
4. Add back to some extent, as a differentiator, distance from goods and services appropriate to the targeted tenant population.
5. Allow previously funded developments (2020, 2021) an opportunity to lease-up and stabilize prior to funding additional developments. Include funded 4% bonds deals as well.
6. Do not count cash flow loans as deferred developer fee. A cash flow loan, 2nd only to a grant, is the most favorable form of financing available. Require Applicant to provide a more detailed statement of cash flows - to offset (what I assume is) the concern that the DDF will not repaid.
7. Reduce the impact of the POI on the overall scoring by reducing the associated points so that are not the differentiating factor. Allow "well rounded" developments the ability to compete.

Thank you for the opportunity to comment.

Brad

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