



PROPERTY MANAGEMENT | DEVELOPMENT

A Davis Real Estate Company

Thank you for the opportunity to submit comments to the 2020 Qualified Allocation Plan. We would like to reiterate of suggestion that the 2020 Application process be a Two-Phase (or Two-Tier) process. We feel that the changes made to the QAP this year have made it more difficult to determine which sites or applications will be strong candidates for funding this year. A Two-Phase process will allow Developers to submit Preliminary Applications and still have the opportunity to make a business decision later in the process as to whether they want to continue pursuing Tax Credits or abandon an application after seeing the Preliminary Point Scores.

### **Appendix B – Development Design Criteria**

We would like to make comments regarding the following items:

- B3. Site and Civil Plans
  - If SC State Housing is going to require the level of detail proposed in the QAP, we would like to request that the Site and Civil Plans be submitted during the second phase of a Two-Phase Application process. The time and money required to complete drawings to necessary level of detail is a significant commitment from both the Developer and the Civil Engineering firm completing the drawing. It would be helpful from a Developer standpoint to be able to understand the chances of a particular application receiving an allocation of Tax Credits before committing time and resources to developing the Civil plans. A rough estimate from a Civil Engineering firm that we have previously used on several Tax Credit developments would be around \$10-\$15,000 and approximately a 4-6 week timeline.

Typically, we do not fully engage the Civil Engineers until after awards are announced due to the significant amount time and expense necessary to develop full civil drawings. We agree that more information is better so that Developers are making more informed decisions and designs when planning Developments but we would like to have enough time to pull plans together and not rush into decisions. Please have the Civil Plans due some time after the initial application to give Developers the necessary information to allocate resources wisely to competitive applications.