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## 2024 - 2025 Qualified Allocation Plan

## Early Feedback, December 2021

Minnesota Housing held an early feedback session for the 2024 – 2025 Qualified Allocation Plan (QAP) and 2023 – 2024 Consolidated Request for Proposal (RFP) in December 2021. The session is available on the Minnesota Housing <u>website</u> to watch or by clicking <u>QAP and Funding Priority Information</u>
<u>Session</u>.

Below are the comments and feedback received during the QAP and Funding Priority Information Session. Responses to the feedback will not be posted during this time. Opportunities to provide additional feedback will take place during the public comment period during the summer of 2022.

For more information the 2024 – 2025 QAP, visit the Minnesota Housing <u>website</u>. To receive updates regarding the QAP, sign up for the <u>eNews</u>.

## The Feedback Provided

- 1) Is the agency talking about how to respond to the ever changing environment i.e. increasing pricing, supply chain issues, interest rate changes etc. from time of RFP submission to selection to closing? Existing selected project trying to close and pending projects from July submissions have increased construction costs.
- 2) Geography: Need for more affordable housing. This may have disparate impact on larger communities in greater MN (Rochester, Moorehead, Duluth, St. Cloud, etc.) in that it prevents housing from gaining points in locations that are close to services (transportation, jobs, etc.). Can you expand on the reasoning and benefit of this criteria? I assume the intention is to spread out the award in Greater MN and not in these communities?
- 3) On the Need for More Affordable Housing criteria, is it possible to refine the scoring algorithm to avoid major shifts in points at census tract boundaries? In dense areas, one side of a street might score significantly better than the other. The census tract isn't how renters search for/experience affordability in a community. thanks.
- 4) For PWD/supportive housing units, there are very limited project-based RA options in rural areas (outside of LTH Housing Support). Rural HRAs will often not award PBVs before a project is awarded tax credits. It would be very helpful if Tenant Based RA options could be used in partnership with local HRAs & service providers.
- 5) Thanks for the encouragement to ask a 'why' question why is MHFA not considering any changes to the geographic scoring? Especially the "needs affordable housing" map seems to create some very illogical boundaries (maybe more so in big cities than in Greater MN.)

- 6) Although the scoring is the same on most of the items, it does appear there is a new location map set of scores. Maybe just make sure everyone knows that?
- 7) Geographic comment: experienced LIHTC developers will not submit an application that cannot geographically score out. We tell communities they will not score out, so it is not worth the significant cost of submit an application.
- 8) In our community (Rochester and the surrounding area), it seems that the need for affordable housing score, plus the multifamily history score, plus the rural score combine to create geographic scores that contribute greatly to sprawl and do not address the real needs in the city itself for affordable housing. This seems to be an unintended consequence that needs to be addressed. Also, how specifically is the need for more affordable housing score calculated? The scores on the map in our community do not reflect the need on the ground; there should not be any "zero" scores in any tract in our community, which is Greater Rochester. Thank you.