



CAPITAL AREA HOUSING PARTNERSHIP

Mission

Capital Area Housing Partnership develops strong, diverse neighborhoods with a focus on affordable housing, homeownership and financial security in mid-Michigan.

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Jim Heinowski
Development Specialist
Nicole Armbruster
Administrative Coordinator

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517.332.4663

www.capitalareahousing.org



October 23, 2019

Chad Benson, Allocations Manager
MSHDA
P.O. Box 30044
Lansing, MI 48909

Dear Mr. Benson,

On-behalf of Capital Area Housing Partnership I write to offer comments and recommendations regarding modifications to the Qualified Allocation Plan (QAP) for 2021-2022. Our recommendations arise from over 8-years' experience participating in MSHDA's Low-Income Housing Tax Credit (LIHTC) program. You will find below suggestions to the QAP that would further support neighborhood-based development, mid-size city development, and capacity building for non-profit community housing development organizations.

1. Go beyond downtowns and provide parallel award for neighborhood-driven development projects, particularly those proposed by established non-profit community housing development organizations. Consider location in a CDBG-designated neighborhood that may positively benefit low-to-moderate income residents.
2. Prioritize projects that involve rehabilitation of strategically located neighborhood anchors, e.g., long-vacant, non-historic, older buildings; schools; buildings occupied/owned/managed by a non-profit; former grocery stores; or hospitals.
3. Re-establish and strengthen the non-profit set-aside. Increase points if applicant is a non-profit CHDO (Community Housing Development Organizations) as designated by HUD/Local Municipality.
4. It is difficult for mid-size cities to compete against larger areas. Rather than a category for populations of 50,000 or more, create an additional category for mid-size cities with populations of 50,000-200,000.
5. Increase points for mixed-income and tenant-owned developments.
6. RE: *Make-up of the Development Team* – Award additional points for non-profits providing service to the community/neighborhood where the proposed development is located. Address the length of time the non-profit has been in operation (Suggest a minimum of 5 years.) Also require substantial non-profit ownership percentage in the project.
7. RE: *Developments near Downtowns/Corridors* – Revise to allow for a development to earn 12 points if project is within 1/3 mile of a geographical coordinate that has a Walk Score of 70 or above instead of the current 80 or above. WalkScore.com defines a Walk Score between 70 – 89 as “Very Walkable”; allowing for most errands to be completed on foot.
8. Create a *Service Funding Commitment* criteria for the Open Category. Award projects points that outline leverage funding from public sources such as local municipality, state agencies and/or federal agencies.



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9. Create a *Supportive Service Coordination* criteria for the Open Category. Award projects points that create onsite services to residents (ie. Rental Counseling, Budgeting Workshops, Financial Capability Workshops, Fair Housing, Landlord/Tenant).
10. Include non-profit community housing development organizations in the QAP focus group committees.
11. Include mid-size local municipalities in the QAP focus group committees.

I would be happy to take part in additional discussion of these recommendations if the opportunity presents itself. Again, thank you for the opportunity to comment, and please do not hesitate to reach out if you have any questions or comments.

Best Regards,

Rawley Van Fossen,
Executive Director