



Chad Benson
Michigan State Housing Development Authority
735 E. Michigan Ave.
Lansing, MI 48909

December 9, 2020

RE: Comments on the Modification of the Qualified Allocation Plan

Dear Mr. Benson and the MSHDA Team,

Senior Housing Preservation Detroit (SHP-D) appreciates the opportunity to provide comments and for the 2022 Qualified Allocation Plan. As a coalition of nonprofit developers and advocates for seniors in the City of Detroit, we have seen the harmful effects that sudden, significant changes in rents and living conditions have had on the long-term residents of the city. Please review the following recommendations that we believe will benefit these particularly vulnerable residents:

- **Preservation and Long-Term Affordability.** Preservation of existing affordable housing for seniors—particularly at 30% AMI or lower—is key to preventing displacement in areas with major rent increases, but these preservation projects often have the highest development costs.
 - *Recommendation:* Restore funding in the Preservation category to 25% and increase points for longer-term affordability commitments.
- **Alternative criteria for neighborhoods of large cities.** Even in neighborhoods that are walkable and contain numerous amenities, developing affordable housing in Detroit is difficult outside of Greater Downtown because the QAP awards points in some sections based on the size of the city. At 139 square miles, Detroit is too large for worthwhile developments in many neighborhoods to meet the same thresholds as those in Downtown and Midtown.
 - *Recommendation:* Align the scoring thresholds in these neighborhoods with the thresholds for similarly-sized suburban cities, particularly in the categories of Developments near Downtowns/Corridors and Neighborhood Investment Activity Areas.
- **Alternative criteria for seniors.** Walk Score and Proximity to Amenities does not account for obstacles that seniors are more likely to be disadvantaged by, such as dangerous intersections and poor sidewalk conditions.
 - *Recommendation:* For elderly developments, provide an alternative scoring criteria to better address the ability of seniors to access essential services and live healthy lifestyles.
- **Nonprofits.** Nonprofit developers are committed to long-term affordability, but they seem to be at a disadvantage in the QAP, largely due to the way experience points are awarded.
 - *Recommendation:* Introduce alternative opportunities for nonprofits to earn points based on their experience serving the target population.

Thank you for your consideration.

Sincerely,

Zach Kilgore, SHP-D Preservation Committee
Claudia Sanford, SHP-D Chair
Michael Appel, SHP-D Preservation Committee Chair