Wilbourne, Kim 9083

From: Holly Douglas [redacted]
Sent: Friday, July 10, 2026 3:06 PM
To: Taxcreditquestions
Subject: [External] 2027 draft QAP comments 3

Good afternoon,

Below are additional comments to the draft 2027 QAP:

1. In looking for new sites and evaluating our existing properties for rehab, we continue to find areas that are "USDA rural designated" within urban counties that are lagging on scoring... Many counties are considered urban because of the county seat or a couple of cities, but still include legitimately rural areas. This makes scoring "bedroom community"-style towns very difficult for both amenities and jobs in the urban counties. If a site falls within a USDA-qualified area inside an urban county, I feel like it could be at least scored as a suburban county location.

Since a site is deemed USDA-eligible rural based on population and proximity to towns of a certain size, applying urban county drive-distance requirements to a USDA-qualified site or existing LIHTC property seems paradoxical. Could applying suburban distance measurements represent a middle-ground approach?

2. For job points, if there were some way to make this a drive time analysis, that would be a more accurate reflection of proximate jobs. Radii circles aren't used for service amenities because one ultimately has to drive or walk there, so would that not be the logical measure for jobs as well? I feel sure alternative mapping tools could do this with polygons?

3. Why was the distance for urban tightened to 1 mile for urban counties? One mile as the crow flies is a super tight drive time circle. And referring back to item 1, it is a death knell for job points if the site is USDA-qualified in an urban county. Please reconsider this change and revert back to the 2-mile increment for urban counties.

4. We have multiple third-party management companies that manage for other developers/owners as well. We have no way of knowing what 8823s may exist in someone else's portfolio or how/if those are being addressed. Even if we receive verbal assurances from our management agent that there are no issues, we can't know for sure if the property isn't ours. While I would certainly like to know if my mgmt company has outstanding, uncorrected 8823s for another owner, it is illogical to penalize an applicant for issues in someone else's portfolio. No mgmt company is talking candidly to their owner about issues/8823s in one of their other client's portfolios.

An alternative could be to require the applicant to elect another proposed mgmt agent upon being notified of an uncorrected 8823 within a specified period, if the 8823 issue falls within someone else's portfolio.

Thank you in advance for your consideration of these comments.

Respectfully,
Holly Douglas