

## Chris Austin

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**From:** Stephen Brock [stephen@brockvi.com]  
**Sent:** Tuesday, October 02, 2012 1:44 PM  
**To:** rentalhelp  
**Subject:** 2013 QAP Comments

Dear Scott:

> My comments regarding the First Draft of 2013 QAP:

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> 1. If loss of flat 9%, current deep income targets will be too deep...they might be anyway. Developers will push OPEX and construction assumptions as well as rents too far. Tax credit prices are expected to fall in non-urban areas, thus putting on more pressure. At 7.3% and no boost and deep income targeting, deals don't work even if land is free...that's at current LIHTC prices much less lower ones. Please reconsider discretionary basis boost and/or reducing/eliminating deep income targeting (at least in non-QCTs/DDAs).

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> 2. Penalizing "right turn only" for site safety does not make sense to me. By definition, it is in fact more safe. Having to do a controlled U turn within a reasonable distance should be viewed as acceptable and even safer.

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> Respectfully,

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> Stephen Brock

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