

TO: NCHFA Staff

FROM: Tim Morgan

SUBJECT: 2023 QAP Comments to First Draft

DATE: September 30, 2022

- 1. Eliminate walk score in its' entirety from the QAP something that is hard to decipher and subject to change quickly, should not be a scoring or tiebreaker criteria.
- Second Tiebreaker: The project with the closest primary amenity distances combined.
- Eliminate construction cap altogether and let the \$1.2M credit cap per project handle it.
- Allow awardees the ability to recycle credits (without penalty) due to lengthy permitting process. In Raleigh, it has taken us 18 months (on two different projects) just to get full site plan approval and the city does not allow you to submit for building permit(s) until site plan approval is in hand.
- 5. Delete the "must have non-medical general merchandise items for sale" as it relates to what a Pharmacy is. These items are readily available at both the grocery and shopping amenity. Prescription drugs should be the sole reason for having a pharmacy as a primary site amenity.
- 6. I still support the agency's decision to eliminate the "Credits Per Unit Average" as a scoring and tiebreaker criteria.
- I still request that the Appendix B and the Field Guide be combined and incorporated as part of the QAP. This eliminates discrepancies between the two documents from occurring.
- I still request that the agency make the Metro County Percentage Calculation in the Metro Region as a true set-aside so that each application competes only against other applications in that county. The agency can establish a minimum threshold point requirement as it relates to amenities. Each of these counties has taxpayer voted money that has been designated for providing affordable housing and it should allocated/spent each year towards housing. Carve outs/set-asides is nothing new for the QAP.

## **Policy Comment**

Carryover Loan Program - increase the loan cap to \$2M OR allow the agency loan to take second lien position. Either one will help to alleviate out of pocket costs for Developer. Land prices, particularly in Metro areas, has and still is, increasing rapidly.





