

Tara Hall

From: Joseph Kass <jkass@nhe-inc.com>
Sent: Friday, September 30, 2022 2:53 PM
To: Scott Farmer; Tara Hall; RentalHelp
Cc: Robinson Villa
Subject: public comments for draft 2023 NC QAP

Thank you for the opportunity to make additional public comments for the draft 2023 NC QAP:

Tiebreakers

Please consider different 1st and 2nd Tiebreakers. Several written and verbal public comments have already been made by multiple development teams, many of these ideas are a great place to begin. Our team would recommend the following ideas for 1st and 2nd tiebreakers, in no particular order of importance:

- bring back Appendix H census tract poverty ratings, or some similar census tract chart
- CPU as a tiebreaker (lowest *OR* closest to average, etc.)
- move current 3rd tiebreaker of '*lowest average income*' up to be 1st or 2nd tiebreaker
- driving distances as a tiebreaker. Keep the 60 points as currently written in the main QAP, but for tiebreaker purposes have a separate chart with: multiple businesses per category, shorter distances, no cap on points, most points wins tiebreaker.

Trending rents and annual rent approval

The NCHFA Compliance Dept uses \$15 per unit per year as appropriate, but Development uses 2% and then 1.5% for HOME units.

Please have NCHFA Compliance Dept match Development with automatically approved increases of 2% per year per unit, with 1.5% approvals for HOME units. Of course, the automatic approvals cannot exceed allowable tax credit or HOME rent charts.

The RPP repayments are based on projections of rent growth, so actual annual rent approvals need to match underwriting projections by NCHFA Development staff. Lenders, syndicators and other financing partners also use NCHFA's 2% per year rent growth projections to set expectations for debt servicing.

APPENDIX B DESIGN CRITERIA

"Retaining walls and graded slopes may not be closer than 25 feet from any building"

- Please reduce this distance to 12 feet. Often sites must be maximized for density to be financially feasible. And often the sites with the greatest access to services, density, walkability, and public transportation are smaller sites requiring a tighter fit.
- Please clarify the definition of graded slopes as well.

"Site lighting poles must be installed in landscaped areas instead of parking spaces."

- Please add language for exceptions if local municipality requires some other configuration for site lighting. The local reviewing municipality can sometimes have strong opinions about where site lighting should be located.

Thank you,

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