Tara Hall

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To: RentalHelp

Subject: EXTERNAL: 2026 QAP Comments

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Below are my comments for the 2026 QAP 1st draft:

- Appendix L consider breaking the regions into point brackets such as top half of counties per region gets 1 point, bottom half of counties per region get 0 points. Another option would be dividing into thirds with 2, 1, and 0 points.
- For 9% only, if the total replacement costs per unit limit needs to stay in the QAP, it should be broken down by region and increased from \$280k. Looking at 2025 full app TRC, I would suggest something around \$335k for Central, East, and West with \$380k for Metro. 4% should have different limits.
- Regarding the developer fee, I am not a fan of allowing deferring over 25% of the developer
 fee. Additionally, we really should get away from the per unit developer fee locked in at the application
 and go to a percentage. I would suggest 12% of eligible basis as a good starting point.
- Allow up to 2 applicant bonus points per application.
- The recycle process for allocations needs to be a standardized procedure annually, most efficiently through RTC in a way that there is documentation at any given time to keep the project's progress towards closing moving forward and not in a place without documentation that puts closings on hold.
- The bus/transit points should be written differently for non-Metro counties. To qualify in a non-Metro, the distance should be increased to at least 0.5 miles without sidewalks, no covered waiting area required, and served 5 days per week.
- Appendix B
 - Remove photometric site lighting, landscape, and fire alarm/sprinkler plans from the Awarded Project Plan Requirements. These are typically and most efficiently done as design build after building permits are issued. These should only be included in the as-built plans uploaded to NCHFA at cost cert.
 - The parking requirements of the QAP should be eliminated and let this be governed by the local municipality.
 - Step in showers allow up to 50% of residential units in family properties including one bathroom units.

- Consider changing the language not allowing water heaters to be installed under HVAC handlers to water heaters to be installed in a location that allows for maintenance service access to both the HVAC handler and water heater. (In the practical case of a low boy water heater installed with a couple inch overlap under the HVAC handler should still be acceptable.)
- Telephone Jack and cable connections in every bedroom and living room should be reduced. With everything moving to wireless internet, streaming TV, and VOIP/wifi phone (or cellular), these requirements should be reduced to requiring internet service/phone in a central location to every apartment either in the living room or master bedroom.
- Instead of requiring storage closets to be exterior, delete the word exterior to allow much more flexibility in the design and use while still maintaining the needed storage for the residents.
- I appreciate the move to Bluebeam to allow a more structured review process by NCHFA, but the 90 day review for plans is too long for a plan moving towards a closing and concurrently in building permit review. The time that NCHFA has for review should be no more than 2 weeks and I believe that can be accomplished by reducing the number of items that NCHFA is reviewing. Since now there is a third party accessibility consultant, and we still have the local municipality reviewing for permits and doing the inspections, NCHFA's review time should be limited to 2 weeks to keep the projects moving forward.
- removable bases in kitchens and vanities I think the requirement in the bathroom vanity is
 appropriate to give usable storage, but the kitchens have plenty of other cabinets for storage, so
 I would propose to require in the bathroom vanities, but not in the kitchen sink and work
 stations.
- bar tops reconsider allowing them as usable countertop length. Based on feedback from
 property management, the bar tops are some of the most used space in the kitchen for a
 variety of applications. You could consider a maximum length allowed in the bartop count, but
 it should not be zero.

Thanks.

Wil Warren Blanket Creek, LLC blanketcreekllc@gmail.com 336.414.0233