



Greensboro Housing Authority
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October 10, 2025

Mr. Scott Farmer
Executive Director
NC Housing Finance Agency
3508 Bush St.
Raleigh, NC 27609

Subject: Greensboro Housing Authority Comments on the 2026 North Carolina LIHTC Qualified Allocation Plan

Dear Mr. Farmer,

Thank you for the opportunity to provide comments on the 2026 North Carolina Low Income Housing Tax Credit (LIHTC) Qualified Allocation Plan (QAP). On behalf of the Greensboro Housing Authority (GHA), and its development entity Greensboro Housing Management Corporation, we respectfully submit the following recommendations as part of our ongoing commitment to preserving and expanding affordable housing opportunities in Greensboro, NC—where we serve as the city's largest provider of affordable housing. As development and preservation costs continue to rise, we recognize the need for creative and flexible approaches to financing affordable housing. However, these rising costs combined with inflationary pressures on consumer goods and essential services make it increasingly difficult for our most vulnerable residents to afford higher rents. We urge the Agency to consider the following comments in support of more reasonable and sustainable housing solutions.

1. Section II – Set-Asides, Award Limitations, and County Designations
Section II.D.2 – Choice Neighborhoods Implementation (CNI) Set-Aside

In light of evolving federal funding priorities, we recommend expanding this section to include projects undergoing repositioning through HUD asset repositioning programs, like Section 18 program, including Section 18/RAD blends. HUD is actively shifting its strategy to support PHAs in leveraging private investment and repositioning assets beyond traditional capital programs such as CNI.

Recent changes enacted in late 2024—outlined in HUD Notice PIH 2024-20—allow PHAs to utilize a higher percentage of Section 8 rents, thereby increasing the leverage of public funds and attracting greater private investment; Including these repositioning tools in lieu of a Choice Set-Aside only would align the QAP with HUD's current direction and support broader preservation efforts.

2. Section IV – Selection Criteria and Threshold Requirements

Section IV.E.2 – Unit Mix and Project Size

The cost of new construction, particularly in developments requiring substantial public and private infrastructure, continues to escalate. When combined with the transaction costs inherent in LIHTC deals, these factors significantly impact per-unit cost.

We are concerned that capping the number of units in a development may reduce cost efficiency and limit economies of scale, especially in vertical mid-rise projects. For example, the infrastructure costs for a 120-unit mid-rise building are often comparable to those for a 200- or 250-unit building, as only one lateral connection is typically required for water, storm, and sewer services.

We respectfully suggest removing the cap on unit count and allowing zoning and financing considerations to determine a project size. This approach would enhance cost efficiency, improve leverage of public funds, and support the delivery of more affordable units.

We appreciate your consideration of these recommendations and remain hopeful that they will be favorably incorporated into the final 2026 QAP. Again, thank you for the opportunity to contribute to this important process.

Sincerely,



James Cox (Oct 10, 2025 16:59:07 EDT)

James Cox

Chief Executive Officer / President