SEML
Development

June 23, 2026

North Carolina Housing
Finance Agency
3508 Bush Street
Raleigh, NC 27609

Re: First Draft 2027 QAP

To Whom it May Concern:

We appreciate the Agency's efforts to implement feedback from its developer partners each year. Below are a few initial suggestions we would like to suggest for the first draft of the 2027 QAP.

Final QAP Timing – While we understand that there are necessary changes to be made to the QAP each year, we do humbly request that a concerted effort be made to have the final QAP released no later than October 15th each year. If this deadline can not be met, we suggest that all scoring and application evaluation criteria be maintained for a two year period.

Rehabilitation Award Limits – We believe the current limit of no more than one rehabilitation project per county should be removed. This limitation unfairly limits rehabilitation efforts, particularly in Metro counties. Many of the Metro counties received multiple awards per year in the early 2000s and with this current limit, no more than one of those projects can be rehabilitated in any given year, this limitation will result in projects waiting too long for potential rehabilitation and may cause some properties to be taken to market rents as the LURA expires.

Principal Award Limit – We believe the limit of one rehabilitation project per principal should be removed as well. There is already a hard cap on how many tax credits one principal can be allocated and we believe the credit cap should be the only limit that determines the number of awards received.

As always, we appreciate all that the agency does to support affordable housing in North Carolina and we thank all of you for your efforts each year to make the application and awards process as fair and efficient as possible.

Sincerely,

Murray O. Duggins, Jr.
Broker-Owner

SEML Development, LLC
2939 Breezewood Ave, Ste 201
Fayetteville, NC 28303
Mduggins@semldev.net