TAFT MILLS GROUP

631 Dickinson Avenue, Greenville, North Carolina 27834

August 17, 2026

North Carolina Housing Finance Agency
Attn: Scott Farmer, Sandy Harris & Tara Hall
3508 Bush Street
Raleigh, NC 27609

RE: 2027 Draft QAP – Comments for Consideration

Dear Scott, Sandy & Tara,

Thank you for allowing us and others the opportunity to provide feedback as it pertains to changes proposed in the first draft of the 2027 Qualified Allocation Plan ("QAP"). Please consider the following:

I respectfully request that NCHFA consider revising the "Other Awards and Returned Allocations" provisions of the QAP to provide an opportunity for an eligible project to return a tax credit allocation and receive a new allocation in a subsequent cycle more than once, when circumstances warrant.

The current QAP limits a project to one return of credits for a new allocation for awards made in 2024 or later. While this provision provides valuable flexibility, there may be circumstances in which a project continues to demonstrate strong readiness, market need, site control, and compliance with the QAP, but experiences municipality delays, funding or other factors outside of the developer's control.

We recommend that the Agency consider allowing a second return and reallocation of credits in a subsequent QAP cycle,

Thank you in advance for your consideration of our suggestions above. Should you need any additional details/insight, please don't hesitate to contact me at dustin@taftmillsgroup.com.

Warmest Regards,

Dustin T. Mills
President