WAKE COUNTY
NORTH CAROLINA

Housing Affordability & Community Revitalization

tel 919.856.5689
fax 919.856.5594

Wake County Office Building
337 S Salisbury Street
Raleigh, NC 27601
www.wake.gov

Submitted Electronically

October 15, 2026

North Carolina Housing Finance Agency
rentalhelp@nchfa.com
Attn: Tara Hall, Senior Housing Development Analyst

RE: North Carolina Housing Finance Agency (NCHFA) 2027 Draft Qualified Allocation Plan – Comments

Dear Ms. Hall,

The Wake County Department of Housing Affordability and Community Revitalization offers the following comments and suggestions for the 2027 Qualified Allocation Plan:

Streamline regulations that limit project size, and increase overall award sizes to account for increasing costs and decreasing equity pricing.

1. The QAP limits project size in number of units, development cost per unit, and maximum LIHTC award. Any one of these on its own could become a limiting factor for the total eligible LIHTC amount. The agency should consider making these restrictions more flexible, such as by removing a cap on the number of units and raising per unit development cost limits.
2. Reflecting recent reductions in tax credit equity pricing, the agency should consider increasing the maximum project award amount above $1,500,000.
3. Consider removing the parking minimum and relying instead on parking requirements established through local zoning.

Make allowances for different cost environments in different regions.

1. The Agency should consider allowing an alternate maximum project award amount for projects located in Metro counties, which experience higher development and land costs, and which are experiencing acute affordable housing crises. This will better enable the LIHTC program to achieve the goal of deeper affordability targeting identified in the QAP, as well as allowing developers to create larger developments containing those deeply affordable units.

   Last year's awards indicate that new construction in Mecklenburg & Wake Counties may only be feasible for senior housing development, and these projects require the maximum award. This further illustrates the ways in which project feasibility is constrained and the maximum award limits what types of projects 9% tax credits can support in these higher-cost markets.
2. The Agency should consider increasing the percentage of the State's tax credit allocation to be awarded to Metro counties, to accommodate both a potentially increased award amount for Metro projects and a greater number of Metro projects. The Agency may also consider expanding its criteria for County award limits beyond a County's population share to consider housing cost growth in the past several years and estimated housing unit deficits, to target those Counties with the greatest affordable housing deficits.

3. If the Agency does not eliminate the cap on project size, the agency should consider increasing the allowable size of 9% tax credit projects in the Metro Region to be greater than 120 units.
4. Consider providing a basis boost for qualifying infill development sites. Metropolitan regions will increasingly need to pursue infill development to increase housing supply, and these projects can be costly, often requiring structured parking and expensive construction types. A basis boost would help make these projects more feasible.

Consider increasing available funding through RPP and WHLP for high-income counties.

1. For the RPP program, the Agency should consider increasing the dollar amount per unit in high income counties above $15,000.
2. The Agency should consider increasing the WHLP funding available per project to $1,000,000 in high-income counties.

Make it easier for LIHTC to support preservation.

1. Consider extending the agency-dedicated basis boost of up to 10% for projects that are located in an Opportunity Zone to include preservation and rehabilitation projects.
2. The Agency should consider specifically setting aside at least one Redevelopment Project for housing authorities in the Metro Region seeking to undertake public housing redevelopment, regardless of their use of RAD or Choice Neighborhoods.
3. The Agency should explore the feasibility of reducing or eliminating the minimum rehab cost for preservation projects to increase the availability of 4% LIHTC to facilitate acquisition and preservation of NOAH properties which may be in good condition and require only minor repairs or system upgrades.

Make site scoring standards more flexible.

1. The Agency should consider replacing the list of qualifying grocery stores with a definition of a grocery store that will allow any establishment that keeps regular hours and where a household could reasonably expect to shop for all dietary needs (i.e. the store offers a variety of fresh produce in addition to staples) to qualify.
2. We support the Agency's commitment to supporting access to high-quality transit by awarding 6 points for location near a bus or transit stop with a fixed location, covered waiting area, pedestrian infrastructure, and regular service. However, limiting the available points to 2 for sites with regular transit access but no covered waiting area may be too large a point deduction, and may limit the feasibility of development of sites which would otherwise be suitable for LIHTC.
3. Likewise, we encourage the Agency to consider adopting standards for demand-responsive transit which could make sites served by high-quality programs eligible for transit access points.

We appreciate the continued opportunity to partner with NCHFA to create more affordable housing opportunities for our low-income neighbors, and we look forward to supporting projects in the 2027 cycle.

Sincerely,



Morgan Mansa, MPPA
Director of Housing Affordability & Community Revitalization