

Chris Austin

From: Jamie Smarr [JSmarr@nhpfoundation.org]
Sent: Thursday, October 03, 2013 11:41 AM
To: rentalhelp; Scott Farmer
Cc: Mark Shelburne
Subject: 2014 QAP Comments and 9% Competitive Credits

Dear Mr. Farmer:

I appreciate the time that you and members of your staff took to introduce North Carolina HFA programs and policies to me and enjoyed your presentations at the recent North Carolina Housing Conference in Raleigh on September 10th. Today I am writing to comment on certain provisions of the NC Qualified Allocation Plan (QAP) for Section 42 Low Income Housing Tax Credits (LIHTC)

I am employed as Vice President of The NHP Foundation, a non-profit (501(c)3) developer/owner of affordable housing in twelve states and the District of Columbia. The NHP Foundation is headquartered in New York City, with an additional fully staffed office in Washington, DC. Currently, our housing portfolio exceeds 5,000 units with another 800 units in production and our portfolio wide occupancy rate is above 96%. Along with the low-cost housing we provide, we offer a very robust resident services program focused on Senior Services, Education, Health & Wellness and Youth Development at our properties. NHP Foundation represents a class of more *nationally focused (as opposed to locally based) housing nonprofits* that provide low income housing opportunities using 9% credits to both families and seniors, such as The Community Builders, Mercy Housing, National Church Residences, and Volunteers of America. Prior to joining the NHP Foundation, I had a successful career financing, building and managing affordable housing and public school facilities in the Northeast as an employee of the Boston Housing Authority, the New York City Department of Housing Preservation and Development, and the New York City Board of Education and as I mentioned, I am a North Carolinian. I was raised and educated in Gaston County and I am a graduate of Duke University.

In 2013, the NHP Foundation completed a 9% LIHTC project for seniors in the District of Columbia (DC) that was financed by the District of Columbia Housing Finance Agency (DCHFA) and the District of Columbia Department of Housing and Community Development (DHCD). This 91-unit senior independent living project was sponsored by NHPF and Allen Chapel AME Church, one of the oldest Black churches in the United States. We also recently completed two 9% LIHTC projects containing 493 units in New Orleans, LA as reconstruction projects following Hurricane Katrina, the largest natural disaster in United States history.

Despite the NHP Foundation's expertise as a developer and owner of affordable housing, it appears that my organization could not qualify for an award of competitive 9% credits in the State of North Carolina. Reference is made to Section IV(D)(1)(a) of the 2014 Draft QAP document. While NHPF has proven that it can successfully finance, develop and manage 9% LIHTC projects in other jurisdictions of the United States, including serving as managing member/general partner of the ownership entity, NHPF has not developed a prior North Carolina project. (The requirement to have developed a prior North Carolina project appears to be a threshold requirement in the 2014 QAP draft.) NHPF along with other nationally focused housing development nonprofits who provide both quality housing and services to low income residents and communities, certainly believes that we have the capital base and development expertise to successfully develop, own and manage low income housing in the State of North Carolina and therefore, respectfully requests that the North Carolina Housing Finance agency reconsider the language of Section IV(D)(1)(a), Section IV(D)(1)(d) and Section IV(F)(2) of the 2014 Draft Qualified Allocation Plan.

Respectfully submitted,

Jamie Smarr
Vice President
The NHP Foundation
122 East 42nd Street, Suite 3605
New York, NY 10168
(646) 336-4929 voice
(646) 336-4941 fax
www.nhpfoundation.org