

## Chris Austin

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**From:** Stephen Brock [stephen@brockvi.com]  
**Sent:** Wednesday, August 20, 2014 5:32 PM  
**To:** rentalhelp  
**Cc:** Sean Brady; Karen Perry  
**Subject:** 2015 QAP Comments

Dear Scott,

We believe the 2014 QAP was overall good policy that has smartly evolved over the years to meet the needs of NC residents. We commend NCHFA on continuing to maintain effective and practical housing policy that is managed in a cooperative, non-bureaucratic spirit.

A few comments for 2015:

\*With NC LIHTC expiring, we believe the main goal should be to minimize the incremental increase on federal LIHTCs to deals so as to continue to build the most possible units (and continue to support the most possible developers). To do so, we recommend:

(1) greatly reducing or eliminating deep income targeting levels.

(2) consider relaxing distances to grocery stores and Rx/dollar stores to 1.5 or even 2.0 miles (perhaps increasing emphasis on visibility to offset any true out-of-the-way properties) to allow lower cost parcels to become viable.

\*Increase discretionary basis boost from 15 to 30% but still put emphasis on minimum tax credits per unit. In this first year without NC LIHTC, having flexibility is key while we all adjust.

\*Consider eliminating the penalty for being within 500' of a major road. We know of no major road or highway in NC that should preclude housing from being even adjacent to it. In urban areas especially, it is common for even high end properties to be overlooking major thoroughfares.

\*Timing - finalizing the QAP in October (vs December) is vitally important this year. Potential property types and deals that may have worked in past years may not work in 2015. Developers need time to adjust. If it can't be finalized earlier, we would request at least publishing first draft earlier, if possible.

\*Please consider Guilford County for Moderate Income (instead of High Income). Its incomes are lower than some Moderate Income counties.

Submitted respectfully,

Rea Ventures Group, LLC  
Brock Ventures, Inc - Stephen Brock  
KRP Investments - Karen Perry