



Greensboro Housing Authority
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Greensboro, NC 27401
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Office
Chief Executive Officer

September 12, 2016

Mr. Scott Farmer
Director of Rental Investment
North Carolina Housing Finance Agency
3508 Bush Street
Raleigh, North Carolina 27609

**Re: 2017 North Carolina Low-Income Housing Tax Credit Qualified Allocation Plan
Comments**

Dear Mr. Farmer:

Thank you for the opportunity to provide comments on the 2017 North Carolina Low Income Housing Tax Credit Qualified Allocation Plan (QAP). As the second largest public housing authority in the state of North Carolina with over 6,100 units of affordable housing and largest affordable housing provider in the City of Greensboro serving the underserved citizens in the City and throughout Guilford County, the Greensboro Housing Authority (GHA) fully understand and value the importance that the low-income housing tax credit program provides to the affordable housing community. Without access to the benefits of the low income housing tax credit program, many affordable housing providers would be severely limited in fulfilling its mission to create and maintain safe, quality, affordable housing to low income families, elderly and the disabled within their communities.

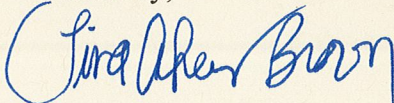
For the past 75 years, GHA has been providing housing to low and moderate-income individuals in the City of Greensboro and Guilford County, together with supportive services through its various programs. In 2013, GHA received a portfolio award from the United States Department of Housing and Urban Development to redevelop its properties through the Rental Assistance Demonstration (RAD) program, whereby all of the 20 properties owned by GHA will convert from the public housing program (Section 9) to a Project-Based Voucher (Section 8) rental subsidy program a long term Housing Assistance Payment contract on each property under the RAD program for the next 20 years. The RAD conversion of all 20 properties will allow GHA to leverage debt financing from the private market and take full advantage of the Low Income Housing Tax Credit (LIHTC) (program administered by your agency (the North Carolina Housing Finance Agency)).

In order to fully participate in the LIHTC program, GHA is requesting a revision to the following sections of the QAP:

1. **Section IV (D)(1)(a): Development Experience** – GHA requests that NCHFA expands the Principal criteria to include qualified public housing authorities (“PHA”s), where PHAs demonstrate technical experience, financial capacity, years in service, and overall development team (consisting of architects, general contractors, financial lenders and equity investors) to be eligible for an award of 9% Tax Credits.
2. **Section IV (D)(1)(d): Development Experience** – GHA requests the addition of a separate section to allow for pre-qualification review by the Agency to qualify as a Principal and receive eligibility to participate in the LIHTC program as an applicant, managing general partner, and Developer for existing properties that are owned by sponsors for public housing revitalization and rehabilitation projects that receive RAD awards.
3. **Section V (B)(4): Allocation of Bond Cap – Eligibility for Award** – GHA requests the insertion of language to allow for PHA sponsors to be eligible for an award of tax-exempt bond volume in particular, projects that serve as a component of an overall public housing revitalization and rehabilitation effort, such as projects that receive a RAD Commitment to Enter into a Housing Assistance Payments Contract for the development proposed by the pre-application.

If you have any questions, or need further information, please contact me at 336-303-3116.

Sincerely,



Tina Akers Brown

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