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September 29, 2023

Scott Farmer  
NC Housing Finance Agency  
3508 Bush Street  
Raleigh NC 27609

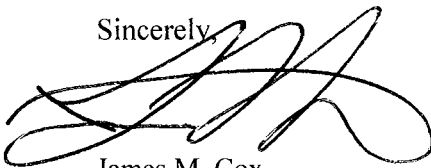
Dear Mr. Farmer,

Thank you for the opportunity to provide comments on the 2024 North Carolina Low Income Housing Tax Credit Qualified Allocation Plan (NC QAP). Please consider the following comments to the NC QAP from the Housing Authority of the City of Greensboro (the "Authority") to expand affordable housing opportunities to those with the most need in communities across North Carolina. Please find below our comments to the 2024 QAP:

1. **Section II.B.2.a. Set-Asides, Award Limitations and County Designations (page 5 and 6 of 35):** We recommend that Section II.B.2.a. be amended to read, "If necessary, the Agency will adjust the awards under the Plan to ensure the overall allocation results in awards for two (2) Redevelopment Projects. Specifically, tax credits that would have been awarded to the lowest ranking project(s) that do(es) not meet the criteria below will be awarded to the next highest ranking Redevelopment Project(s). The Agency may make such adjustment(s) **to allow for a tax credit award to redevelopment projects that are unable to qualify for an award** in any geographic set-aside. (New language in bold)
2. **Section II.B.2.b.v. - Set-Asides, Award Limitations and County Designations- Designations – Redevelopment Projects - (page 6 of 35):** We recommend that Section II.B.2.b.v. be amended to read, "Is part of the Rental Assistance Demonstration (RAD) Program, Section 18/ demolition/disposition, and other public housing repositioning tools." The HUD Section 18/ demolition/disposition program is an existing tool through HUD to redevelop existing public housing properties, which utilize long-term project-based housing subsidy voucher assistance. The Authority requests the inclusion of the recommended language into the 2023 QAP because public housing authorities use the RAD, Section 18 programs, and other repositioning programs as effective tools to implement redevelopment projects, which is consistent with the QAP's definition for redevelopment projects.

3. **Section IV.D.1.d - Application/ Project Developer Qualifications (Page 20 of 35)** - We recommend that Section IV D.1.d. be amended to read, “To be eligible for an award of 9% Tax Credits, at least one Principal must have successfully developed, operated and maintained in compliance one (1) 9% Tax Credit project in North Carolina or six (6) separate North Carolina 9% Tax Credit projects totaling in excess of 200 units.” We request the inclusion of language to allow that at least one Principal must have successfully developed, operated and maintained in compliance either one 9% tax credit project or six (6) separate 4% Tax Credit projects in North Carolina. This request will allow for Principals that successfully developed, operated, and maintained in compliance tax credit projects in NCHFA’s LIHTC program.
  
4. **Section IV.C.1 Pages 17 and 18 of 35) – Maximum Project Development Costs:** RED-CD recommends that the Agency increase the project development costs to \$200,000 without receiving a negative point score for projects that qualify under chart B, which are GHA projects.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Cox', with a large, stylized flourish extending from the end of the signature.

James M. Cox  
Chief Executive Officer