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Office  
Chief Executive Officer

September 28, 2022

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

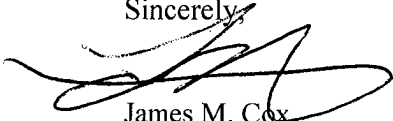
Dear Mr. Farmer,

Thank you for the opportunity to provide comments on the 2023 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 2023 QAP:

1. **Set-Asides, Award Limitations and County Designations – Section II (B.2.a.) (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. **Set-Asides, Award Limitations and County Designations- Designations – Redevelopment Projects - Section II (B.2.b.v.) (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 (A.1.b.v) (Page 16 of 35)**- We recommend that Section IV A.1.b.v be amended to read under the last paragraph, “For Redevelopment Projects, the walk score will be exempt, and the Agency will award two (2) points for these projects.
4. **Section IV (D.1.d) (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.
5. Section IV (F.7) (page 24 of 36) – We recommend Section IV (F.7) be amended to read, “The project with the highest overall Walk Score; except for Redevelopment Projects, which are exempt from the Walk Score.

Sincerely,

A handwritten signature in black ink, appearing to read 'James M. Cox', is written over the word 'Sincerely,'.

James M. Cox  
Chief Executive Officer