

## Tara Hall

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**From:** Traci Dusenbury <traci@halconcompanies.com>  
**Sent:** Tuesday, November 21, 2023 5:05 PM  
**To:** Tara Hall; Scott Farmer; RentalHelp  
**Subject:** 2024 QAP Comments 2nd Draft

Please remove the 3rd Tiebreaker altogether. This puts undue stress on the Developers during the holiday season and many brokers and sellers are also enjoying time with their families. Local Government staff definitely are not available. This does nothing to promote better applications or better placement of projects throughout NC. I strongly oppose this. I don't agree with moving it to January 5th or any date prior to January 19th, the actual deadline date. There is absolutely no reason to have this at all. We--many Developers-- asked you to move the deadline to the 3rd week of January for a reason about 10 years ago and that reason was because it was very difficult with the holidays and with sellers allowing property to go under contract until January so we needed an additional week. You allowed this and now trying to give us a tiebreaker to move the deadline up closer to the holidays again is completely counterproductive. Please just either move the 4th tiebreaker up to 3rd or make the 3rd tiebreaker the census tract with no project funded the year before in that County. If several are in the same census tract, it'll go to 4th tiebreaker. I have never felt more strongly about something you have proposed before.

Please allow 5 income bands or remove the requirement for 10% of the units at or below 30%. The high-income counties already have to do this. This makes it very difficult for moderate-income counties. They basically have to use 30/40/50 and 80. There is no way they can use 60% AMI if they are doing income averaging. Because of having to meet the moderate- income targeting requirement at 40% and the 30% requirement and the RPP requirement of units below 50%, there is absolutely no way they can also have 60% units. If you put 40% of the units at 30% and 40% AMI, it really hurts moderate- income counties. Financially, it makes it much more difficult for the numbers to work for a moderate-income county. I haven't even run numbers on a low-income county yet, but I'm guessing it will hurt them financially as well.

Thanks,  
Traci

