

September 28, 2023

North Carolina Housing Finance Agency
3508 Bush Street
Raleigh, NC 27069

Re: 2024 North Carolina QAP Questions/Comments

Hello,

Thank you for the opportunity to provide feedback on the first draft of the 2024 QAP. Below are our questions and comments.

Question:

Is the Golden LEAF considered non-agency awarded and non-related party funding as it related to the second tiebreaker?

Comments:

Tiebreaker Criteria – Section IV(F)7(: Third tiebreaker should be eliminated. Submitting a preliminary application first has nothing to do with the quality of the development, the most efficient use of resources, nor does it benefit the tenancy. Applications should be awarded based on factors that relate to the quality of development and not how quickly a pre-application is submitted. Deadlines should be a threshold and not a scoring factor.

Site amenities - Section IV(A)1b(ii): Increasing the secondary amenities points means rewarding sites closer to services. These sites most likely would be more expensive given their proximity to the amenities. Since land is ineligible for tax credits, projects would need to seek more leverage which puts financial strain on the project in a rising interest rate environment. Please consider reducing the amenity points back to a maximum of 38 points.

Project Development Costs – Section IV(C)1(a): adjacency to a CBD for Chart B costs should be defined. How many miles from the CBD is still considered adjacent?