



**Lee Cochran**

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October 21, 2019

Mr. Chris Austin  
Director of Rental Investments  
North Carolina Housing Finance Agency  
3508 Bush Street  
Raleigh, NC 27609

Re: Comments to the Second Draft of the 2020 Qualified Allocation Plan (QAP)

Dear Mr. Austin:

On behalf of Laurel Street, I would like to thank you for your continued service to the North Carolina Housing Finance Agency (NCHFA) and to the state's affordable housing development industry. We also appreciate this opportunity to share comments to the Second Draft 2020 QAP.

We believe the removal of the census tract poverty rate as a tiebreaker in the First Draft 2020 QAP was a great step and recognized the important role that well designed and executed affordable housing developments play in the revitalization of neighborhoods and cities. We also agree strongly with the addition of *"the county with the least number of 9% tax credit units created over the last 5 years"* as an additional tiebreaker. NCHFA has always worked to achieve an equitable distribution of tax-credit awards across North Carolina's counties and this new tie breaker is a great new tool to achieve that goal.

We have two requesting changes that we would like to see in the Final 2020 QAP. First, we would suggest removing the census tract poverty rate as a tiebreaker such that "the county with the least number of 9% tax credit units created over the last 5 years" becomes the First Tie Breaker. Since two projects with the same overall score are equally deserving projects under the QAP, it makes sense that the First Tie Breaker be related to equitably distributing those deserving projects across counties.

Second, we believe that the minimum number of redevelopment projects that are awarded under Section II.B.2.(a) be increased from two to four projects. In 2019, there were six projects that were successfully designated Redevelopment Projects under the QAP suggesting there is great demand to see affordable housing used as a revitalization tool.

Thank you very much for your consideration.

Sincerely,

Lee M. Cochran