



October 17, 2019

North Carolina Housing Finance Agency
Attn: Chris Austin
3508 Bush Street
Raleigh, NC 27609

Subject: 2020 QAP comments

Chris,

We respectfully submit the following comments regarding the 2020 Qualified Allocation Plan:

Section II.D.2. - As of the 2nd draft of the 2020 QAP, the limit on non-profit awards is proposed for elimination. We fully support and appreciate this change.

Section II.G.2. – We support DHIC’s recommendation to consider allowing principals of projects returning credits to submit application(s) for 4% tax credits in the subsequent tax credit allocation year.

Section IV. A.1.(b)ii. – We support CMHP’s recommendation to add Home Depot and Lowes to the list of qualifying shopping establishments.

Section IV.C.1.a. – We appreciate the increase in maximum project development costs in the 2nd draft of 2020 QAP, to \$80,000 for Chart A and \$91,000 for Chart B. However, we still feel that this does not adequately address higher cost development areas in our state, especially in consideration of the higher monitoring fees proposed in the 2nd draft. We would propose either separate Chart A and B for Metro areas (as proposed by CMHP) or an across the board increase to \$85,000 for Chart A and \$96,000 for Chart B.

Section VI.A.8 – The Smoke-Free Housing requirement does not explicitly address E-cigarettes and vaping. Consider clarifying “smoking” to include vaping and e-cigarettes.

Draft Appendix B Comments

Section II.D.4 and II.E.11 – Consider eliminating the requirement for call-for-aid station in bedrooms and bathrooms of Type A units. Even if Type A tenants are properly instructed that these devices only signal a strobe alarm outside their unit, many falsely believe that the pull cord will automatically notify emergency first responders or an “on-call” site manager. Neighbors also are often unfamiliar with the pull-cords since they do not have them in their





units. These create a nuisance via accidental pulls by children and pets. Worse, they can be a liability insofar as tenants erroneously believe that pull cords are a replacement for dialing 911.

Section IV.– We were encouraged to hear at this year’s Developer’s Workshop that the Agency will be replacing the outdated Energy Star 2.0 requirement with a more current green building standard in 2021.

Section V.F.1 and 2 – The minimum of 1.75 parking spaces per unit for family developments and 1 per unit for elderly is significantly higher than national best practices for affordable multifamily. We would recommend reduction to 1.3 for family and .75 for elderly.

Section V.F.3 – The proposed process for gaining prior Agency approval for a reduced parking ratio has become confusing. Who determines whether a site (rather than a local guideline) limits parking to less than the Agency requires? Site constraints often come into play when assessing available area for parking, but clearer guidance on how the Agency evaluates requested parking ratio reductions would be helpful. Particularly in metro areas, minimum parking requirements can dramatically drive up construction cost.

Section V.F.4 – Consider “blue-top” asphalt in addition to concrete as an acceptable surface for handicap parking spaces and associated access aisles.

Section V.G.2. - Minimum 18” of concrete depth for a dumpster approach is an excessive standard that will add unnecessary cost, particularly in urban areas where trash is serviced by a smaller fleet of trucks.

Thank you for your many years of partnership and for your consideration of these recommendations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cindy Visnich Weeks', is written over a light blue circular stamp.

Cindy Visnich Weeks
Vice President, Community Rental Investments
Mountain Housing Opportunities

