



WODA COOPER COMPANIES

500 South Front St
10th Floor
Columbus, Ohio 43215
Office: 614.396.3200
www.wodagroup.com

October 17th, 2019

Scott Farmer
Executive Director
North Carolina Housing Finance Authority
3508 Bush Street
Raleigh, NC 27609-7509

RE: 2020 QAP 2nd Draft Comments

Dear Mr. Farmer,

Thanks again for the continued opportunity to comment regarding the 2020 QAP. We certainly understand crafting a QAP isn't easy as NCHFA delicately balances input from numerous stakeholders to reach the end goal of facilitating high quality affordable housing for working class North Carolinians. As such, we feel particularly moved to make the following point:

1. Tiebreaker Criteria – First Tiebreaker: *The project in the census tract with the lowest percentage of families below the poverty rate.*

We strongly believe NCHFA should maintain the first tie breaker as the lowest percentage of families below the poverty rate. First, doing so allows NCHFA to favor development in amenity rich opportunity areas. Such areas tend to not only have better schools for families, but also greater access to decent paying jobs. Second, this also helps the agency deconcentrate poverty. Section 42 allows for developments in a Qualified Census Tract to receive the basis boost which for decades has led to the concentration of poverty. In response to this, we have seen nearly all of the 15 states we work in over the last decade incentivize areas of opportunity which we believe is good public policy. Thus, we recommend NCHFA keep the first tiebreaker as the lowest percentage of families below the poverty rate as currently included in the Second Draft QAP.

Please contact me at (912) 224-2169 if you have any questions as we welcome any feedback on the matter. Again, we greatly value this opportunity to comment as we find it important to creating good public policy and look forward to partnering with you more in the future.

Sincerely,

Denis Blackburne, Senior Vice President
Woda Cooper Companies, Inc.

Cc: Jeffrey J. Woda, President, Woda Cooper Companies, Inc.
David Cooper, Jr., Executive Vice President & General Counsel, Woda Cooper Companies, Inc.
Chris Austin, NCHFA

OFFICES LOCATED IN GEORGIA, INDIANA, KENTUCKY, MARYLAND, MICHIGAN, OHIO AND VIRGINIA.

WODA COOPER COMPANIES, INC. IS AN ESOP OWNED COMPANY AND PARENT COMPANY OF WODA CONSTRUCTION, INC., WODA MANAGEMENT & REAL ESTATE, LLC,
AND WODA COOPER DEVELOPMENT, INC.