



Greensboro Housing Authority
450 North Church Street
Greensboro, North Carolina 27401
Telephone 336-275-8501

Office
Chief Executive Officer

October 15, 2021

Scott Farmer
NC Housing Finance Agency
3508 Bush Street
Raleigh NC 27609

Dear Mr. Farmer,


Thank you for the opportunity to provide comments on the 2022 North Carolina Low Income Housing Tax Credit Qualified Allocation Plan (NC QAP). Please consider the following comments to the NC QAP from the Housing Authority of the City of Greensboro (the "Authority") to expand affordable housing opportunities to those with the most need in communities across North Carolina. Please find below our comments to the 2022 QAP.

1. **Set-Asides, Award Limitations and County Designations – Section II (B.2.a.) (page 5 and 6 of 35)** We recommend that Section II.B.2.a. be amended to read, "If necessary, the Agency will adjust the awards under the Plan to ensure the overall allocation results in awards for two (2) Redevelopment Projects. Specifically, tax credits that would have been awarded to the lowest ranking project(s) that do(es) not meet the criteria below will be awarded to the next highest ranking Redevelopment Project(s). The Agency may make such adjustment(s) **to allow for a tax credit award to redevelopment projects that are unable to qualify for an award** in any geographic set-aside. (New language in bold)
2. **Set-Asides, Award Limitations and County Designations- Designations – Redevelopment Projects - Section II (B.2.b.v.) (page 6 of 35)** We recommend that Section II.B.2.b.v. be amended to read, "Is part of the Rental Assistance Demonstration (RAD) Program, Section 18/ demolition/disposition, and other public housing repositioning tools under HUD." The HUD Section 18/ demolition/disposition program is an existing tool through HUD to redevelop existing public housing properties, which utilize long-term project based housing subsidy voucher assistance. The Authority requests the inclusion of the recommended language into the 2022 QAP because public housing authorities use the RAD and Section 18 programs as effective tools to implement redevelopment projects, which is consistent with the QAP's definition for redevelopment projects.

3. **Section IV (D.1.d) (Page 20 of 35)** - We recommend that Section IV D.1.d. be amended to read, "To be eligible for an award of 9% Tax Credits, at least one Principal must have successfully developed, operated and maintained in compliance one (1) 9% Tax Credit project in North Carolina or six (6) separate North Carolina 4% Tax Credit projects totaling in excess of 200 units." We request the inclusion of language to allow that at least one Principal must have successfully developed, operated and maintained in compliance either one 9% tax credit project or six (6) separate 4% Tax Credit projects in North Carolina. This request will allow for Principals that successfully developed, operated, and maintained in compliance tax credit projects in NCHFA's LIHTC program.

To the extent that NCHFA does not include the aforementioned recommendation to allow for at least one Principal to participate in the 9% LIHTC program with 4% LIHTC experience, then the Authority requests an adjustment to the requirement of the principal to have successfully developed one North Carolina 9%, six separate 9% projects or 9% projects totaling 200+ units nationwide. Additionally, there should be an exception for non-North Carolina developers partnering with local Public Housing Authorities in their redevelopment efforts, especially in light of PHAs efforts to redevelop its properties through the RAD program and/or the HUD Section 18 program.

Sincerely,

A handwritten signature in blue ink, appearing to be 'J. Cox', written over a horizontal line.

James M. Cox
Chief Executive Officer