

## Tara Hall

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**From:** Thomas <tomu@mindspring.com>  
**Sent:** Tuesday, September 26, 2023 4:11 PM  
**To:** Tara Hall  
**Cc:** Julia Bryan  
**Subject:** 2024 QAP third set of comments

Tara:  
Below are my comments about the first draft of the 2024 QAP.

I wish to object to a couple of changes proposed in the 2024 North Carolina Qualified Allocation Plan for Low-Income Housing Tax Credits and make further suggestions:

Changing the maximum site points to 48 will result in almost no or no Seniors Projects being awarded. There are very few sites within 1.5 miles of a Seniors' Center as defined in the QAP and the few that are frequently do not have the maximum score in other amenities. The statistics for 2023 are 25 nine percent applications for Seniors projects were preliminarily submitted (27 less 2 immediate withdrawals). Of the twenty-five 19 had no points for being close to a Seniors' Center, 2 had one point and 4 had three points. Two of the 4 with three points lost maximum points for distance to other amenities one of the applications with a single point also failed to score maximum points for the other amenities. **No Seniors project that was approved in 2023 had any points for the Seniors' Center amenity. Only 2 of the twenty-five preliminary applications would have scored the maximum of 46 points as proposed in the first draft of the 2024 QAP.** I do not believe that the NCHFA wants to handicapped seniors projects proposals in this way.

1. I would propose revising the maximum score to 43 rather than 46. This will give senior's project a chance if they receive the maximum for each of the other amenities. I also note that the tenants in Seniors projects rarely use senior centers.
2. The new second tie breaker may result in some cities/counties being able to pick and choose which one of multiple sites submitted in their jurisdiction will be the winner by providing outside funds. This raises the possibility of bias in the selection process. The NCSHA recommends against giving localities the ability to decide if and where projects can be developed. I am recommending that either the local money has to be available to all projects in the county/city or the funds do not count towards this tiebreaker. IE Like Charlotte Mecklenburg County does versus Raleigh/Wake County.
3. I want to strenuously object to the new third tiebreaker which is the time when the preliminary application is submitted to the North Carolina Housing Finance Agency. How does this help in finding the best projects for the 2024 allocations of LIHTC? This seems to favor previous sites that were submitted in past years. Also, how will it be determined? Will all the projects submitted on a particular day get the same rank or will one submitted at 8:59:59 AM be ranked ahead of one submitted at 9:00 AM?
4. Make a new tiebreaker to follow the tiebreaker *"The project with the lowest average income targeting at time of preliminary application submission."* *"The lowest tax credits per unit."*

Make the final tiebreaker a random drawing of lots. It may be possible current *"In the event that a tie remains after considering the above tiebreakers, the project requesting the least amount of federal tax credits will be awarded."* would result in a tie. This is because the maximum \$1,200,000 in LIHTC per project might be requested by projects that tie otherwise.

Tom  
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