

Initial Comments to the first draft of the North Carolina Low-Income Housing Tax Credit (LIHTC) Qualified Allocation Plan (QAP).

The allocations by region may need a slight tweak. The 2017 NC Counties Population estimate would take 1% away from the Central Region and Give it to the Metro Region. This would lower the Central Region to 23% and Increase the Metro Region to 38%.

I think the limit on the total LIHTC awarded to a principal should be raised to \$2,000,000. This would allow a principal to receive relatively the same percentage of the total LIHTC as they have in the past. (Section II E. Principal and Project Award Limits 1. Principal Limits)

I think that the limit on the maximum award to any one project should be raised to \$1,100,000. This would make the maximum award approximately the same percentage of the total LIHTC as previous years. (Section II E. Principal and Project Award Limits 2. Project Limits)

I am confused by the monitoring fee additional information. Will the owner of a project financed with an Agency issued bond be assessed a fee of \$1,200 per unit or \$900 per unit with an additional \$1,200 fee? (Section III B. Application, Allocation, Monitoring and Penalty Fees 5.)

The maximum site evaluation is now 60 points rather than 62 points. (Section IV Selection Criteria and Threshold Requirements, A. Site and Market Evaluation 1. Site Evaluation (Maximum 62 Points)

The limit on the total for Line 5 and 6 of the PDC Description needs to be adjusted to reflect that Chart B projects are likely to need more than \$90,000 per unit. Leaving this in as currently written will exclude mid-rise elderly project and most of the other projects listed as a Chart B project. . (Section IV Selection Criteria and Threshold Requirements, A. Site and Market Evaluation 2 Market Analysis. C. Project Development Costs, RPP Limitations, and WHLP (b))

The Agency approval of projects with in excess of 200 units needs to be modified to reflect the “floating” application dates. There is no fixed preliminary application date for some projects. Perhaps an approval process could be initiated x days before the application is submitted. Section IV Selection Criteria and Threshold Requirements, E. Unit Mix and Project Size 3.)

The Operating R language showing a minimum of \$1,500 per unit is less than ½ of the minimum operating expenses. Since the higher requirement is in place I am not sure that the language needs to be changed

Respectively submitted by Thomas W. Urquhart