



October 13, 2023

Tara Hall
Manager of Rental Development
North Carolina Housing Finance Agency
3508 Bush St.
Raleigh, NC 27609

RE: 2024 QAP 1st Draft Comments,

Ms. Hall,

On behalf of Woda Cooper Companies, Inc., we are pleased to submit the following comments on the 1st draft of the 2024 North Carolina Qualified Allocation Plan (QAP).

- 1. Section II(E)2 – Project Limit** – The project credit limit of \$1,200,000 has been constant since the 2021 QAP. Since that time, both interest rates and construction costs have drastically escalated while the tax credit equity market has declined. This has resulted in developments being increasingly smaller, which leads to a less efficient use of resources as fixed costs (land, legal fees, etc...) are spread over fewer units. Increasing the per development credit cap to \$1,500,000 would lead to additional units being funded across the state.
- 2. Section IV(A)1(ii) – Amenities** – Woda Cooper applauds the increase in maximum amenity scores. Living in proximity to amenities increases residents' quality of life and should be incentivized to the greatest extent possible with regards to site selection. In order to further enhance this category, we suggest that the bus stop number of days of operation be reduced from 6 to 5. The existing requirement of the bus route running 6 days/week disadvantages rural areas which often only have bus routes running during the week. 5-day bus routes provide strong value to residents and should receive consideration in scoring.
- 3. Section IV(F)7 – Tiebreakers** – The new second tiebreaker of highest percentage of non-Agency awarded and non-related party funding places an onus on the developer to secure local financial support for developments. One adverse consequence of this policy is that it will lead to affordable housing only being awarded in areas which desire it. Many areas of the state would benefit from new construction of affordable housing yet face NIMBY opposition. Developments in those areas are unlikely to receive local financial support. We recommend this tiebreaker be de-emphasized in the 2nd draft of the QAP.

We appreciate the opportunity to provide feedback and look forward to future development of essential affordable housing.

Sincerely,

Garrett LeDonne

Garrett LeDonne
Woda Cooper Companies, Inc.

Cc: Scott Famer, NCHFA
David Cooper, Jr., Woda Cooper Companies, Inc.
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