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August 25, 2012

Mr. Robert Kucab
Executive Director
North Carolina Housing Finance Agency
3508 Bush Street
Raleigh, North Carolina 27609

Re: Request for Changes to 2013 Qualified Allocation Plan (QAP)

Dear Mr. Kucab:

On behalf of members of the Carolinas Council of Housing Redevelopment & Code Officials (CCHRCO), a collaboration of Executive Directors representing all North and South Carolina housing authorities, we would like to formally submit a request for changes to the 2013 QAP. As leaders of organizations committed to providing affordable housing to the neediest of North Carolina families, we support the work of the North Carolina Housing Finance Agency (NCHFA) and acknowledge and appreciate your ongoing support of public housing authority efforts. As you know, much of the work we do is within our existing portfolio of real estate. We believe that just as it is important to identify new affordable housing opportunities in our State's strongest communities, it is also important to preserve and redevelop housing in existing communities. With the support of major federal funding from the U.S. Department of Housing and Urban Development (HUD), housing authorities are redeveloping old public housing inventory and providing one-for-one replacement with affordable housing units. These efforts are critical by ensuring current affordable housing units are preserved at the high quality levels required to keep neighborhoods strong.

HUD's primary funding source for such revitalization efforts has been HOPE VI, which is now transitioning to Choice Neighborhoods. As you know, these grants are highly competitive. If housing authorities in North Carolina are fortunate to be awarded these competitive grants, we believe the State should make an explicit commitment to support the same revitalization efforts. **As such, we respectfully request the 2013 QAP be amended to include advance commitments to HOPE VI or Choice Neighborhood projects.** We request these awards be allocated ahead of the other pools or from forward commitments and the awards go to applications for on-site or off-site HOPE VI or Choice Neighborhood projects. Funding, at a minimum, should equal the maximum mortgage subsidy points in the Metro Region. Given the level of grant funding typically provided by HUD for HOPE VI or Choice Neighborhood, grantees would be well positioned to make such a commitment to the project, irrespective of the region from which the application is made.

Further, we believe the 2012 QAP includes a meaningful disadvantage for housing authority efforts to revitalize existing public housing sites and their surrounding neighborhoods. While being a “designated” Redevelopment Project provided equal Neighborhood Characteristic points for being near structures that are well maintained, Redevelopment Projects were not awarded any offsetting points for proximity to amenities. Practically speaking, it is the very need for redevelopment that has likely limited the proximity to amenities. As you know, many developers obtained land control for parcels in close proximity to amenities in order to address this 2012 requirement. It is important that North Carolina not lose the opportunity to improve the quality of existing communities simply because the property is located further away from current amenities. While we believe it is important for residents to have access to amenities, it is highly unlikely these amenities would exist within a couple of miles of the Redevelopment Project site. The redevelopment of housing is the first step in the revitalization of neighborhoods to ultimately lead to greater access of amenities for residents. **As such, we respectfully request the 2013 QAP be amended to include amenities points for Redevelopment Projects that include a “2-mile waiver.”** Effectively, if maximum points for other projects are achieved with proximity to amenities within 0.5 miles, then maximum points for Redevelopment Projects should be achieved for proximity to amenities within 2.5 miles. The distance intervals that exist thereafter could remain the same. We believe this request is particularly reasonable if the site has good access to public transportation.

Again, we appreciate the NCHFA’s funding and support of affordable housing developments in the State. Thank you for considering our recommendations for the 2013 QAP. These changes will facilitate our ability to leverage housing authority assets, resources, and major federal funds for affordable housing developments across the State to meet the housing needs of North Carolina families.

Sincerely,



Board Chairperson

Cc: Scott Farmer, Rental Investment Department