From: Scott Farmer < bsfarmer@nchfa.com > Date: October 19, 2012, 5:50:38 PM EDT

To: Chris Austin <<u>claustin@nchfa.com</u>>, Mark Shelburne <<u>mhshelburne@nchfa.com</u>>

Subject: Fwd: QAP Comments

Begin forwarded message:

From: Darryl Hemminger < dhemminger@laurelstreetres.com>

Date: October 19, 2012, 4:56:30 PM EDT **To:** Scott Farmer < bsfarmer@nchfa.com>

Cc: Dionne Nelson < dnelson@laurelstreetres.com>

Subject: QAP Comments

Dear Scott - Laurel Street Residential is honored to have worked with the North Carolina Housing Finance Agency (NCHFA) to develop affordable housing for low income families across the state. We appretiate the opportunity to share with you our suggestions / comments on the 2013 QAP.

Redevelopment Projects

We believe that the 2013 QAP includes a meaningful disadvantage for housing authority efforts to revitalize existing public housing sites and their surrounding neighborhoods. We recognize and appreciate the fact that Redevelopment Projects have been given an exemption on the Neighborhood Characteristic points, these same projects are not currently given a similar exemption 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. As such, those projects will continue to outscore Redevelopment sites in the following rounds. We feel it is important that North Carolina not lose the opportunity to improve the quality of existing communities simply because the existing land is located further away from current amenities. While we believe it important for residents to have access to amenities, due to the decline that has already occurred in some of these communities, it is highly unlikely that these amenities would exist within a couple of miles of a Redevelopment Project site currently. Redeveloping the housing is the first step in revitalization that will ultimately lead to better amenities for residents overall. As such, we request that 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. In order to insure this waiver never puts a resident in a position where they are unable to access the needed amenities, we further recommend that this waiver be allowed only in cases where reasonable public transportation service is provided to the property, or in the case a some rural developments where public transportation may not be available, the property commits to

providing a private transportation service of equal quality. We believe this request will allow most Redevelopment Projects to compete with the balance of the applications.

Guilford County / Metro Region

We would like to suggest that Guilford County be included in the Metro Region. As the QAP currently reads, Guilford County will only be allowed a single deal per year. Guilford is the 3^{rd} largest county, and includes more than one metropolitan area, and it's population well exceeds $\frac{1}{2}$ million people. We believe it is unfair for Guilford County to be treated as equal to all other counties (except Meck and Wake).

We otherwise found the QAP to be an effective guide to producing affordable housing in the state. Please contact me should you have any questions. Laurel Street Residential looks forward to working with the NCHFA in the future, and thank you again for the opportunity to provide you with our feedback.

Sincerely,

Darryl Hemminger



Darryl Hemminger Senior Vice President

1300 Baxter Street, Suite 370 Charlotte, NC 28204 Tel 704.561.5234 Fax 704.561.5228 www.laurelstreetres.com



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