

October 13, 2015

North Carolina Housing Finance Agency
Attn: Mr. Chris Austin
3508 Bush Street
Raleigh, NC 27609

Mr. Austin,

We appreciate the opportunity to submit additional comments regarding the 2016 QAP. Our comments are as follows:

Page 4. A-Selection Criteria: Add- Provide workforce housing.

Page 6. II B. 2 (b)(v)-Require unit of local government to issue a commitment letter that provides the source of funds sufficient to complete the scope of the unit of local governments obligations.

Page 8. III A- All applications (preliminary and full) should be posted on the NCHFA's website. If not at least the zoning status of the site or require proper zoning at preliminary.

Page 10. IV A 1 (a)(i)- All options, contracts, and deeds should be supported by a title opinion by the project attorney.

Page 11. (ii)- Zoning should be in place at preliminary application submittal.

Page 12. IV A 1 (b)(ii)- Combining grocery, pharmacy and shopping, i.e. Super Wal-Mart and Targets etc., should receive additional points. Some of our tenants do not have an auto and depend on a taxi or walk to these services. Those that do should be given every opportunity to save gas.

Page 13. IV A 1 (b) (iii)- Needs to be NCHFA's discretion.

Page 15. IV C 1 (a)- Per WHLP legislation those funds should not be used for Chart B projects.

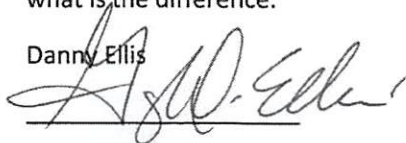
Page 16. 3 (a)- Under current legislation WHLP is not similar to the legacy state credit program.

Page 19. IV F 2- I hope NCHFA can come up with an alternative to the "Race to the bottom" for scoring. Review the site selection criteria in the 2011 QAP.

Page 28. VI B 3.- There should be no cap on credit pricing. Especially if the "Race to the bottom" continues. Unfair to developers that can maximize credit pricing. Skews credits per unit.

Page 30. VI B 7 (e)- I can see no reason for limiting contractor profit overhead. With cost certification what is the difference.

Danny Ellis



Fred G. Mills, Sr.

