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Mr. Scott Farmer
North Carolina Housing Finance Agency
3508 Bush Street
Raleigh, North Carolina 27609-7509

Re: Comments, First Draft 2016 QAP

Dear Scott:

Amenities – Shopping

This comment will address the Amenities section, specifically the language pertaining to shopping. The current language allows certain establishments to "qualify" as shopping for purposes of site scoring. While these establishments do not appear to be exclusive per the current language, it is also not clear whether other similar stores of the same quality or even better quality would be permitted. As such, applicants are reluctant to choose any establishments other than those currently listed due to the potential of losing points in the application process.

Establishments such as Belk, JC Penny's, Sears, TJ Max, Steinmart and the like, while not specifically listed, may or may not qualify under the current language. There are many shopping establishments other than those currently listed that should qualify and provide the same purpose which embodies the spirit of the QAP.

Additionally, the current shopping establishments specifically mentioned in the QAP are not typically found in shopping malls whose shopping provides similar services. Another point to consider is that we may be insulting our tenants by only allowing the establishments currently listed when many may choose and prefer other establishments. Again, the current language does not currently mandate the specific list but it also makes it unclear as to whether other similar stores would qualify.

Perhaps the current language could expand the choices to other regional and or national chains without specifically listing stores and at the same time exclude non established shopping stores i.e. those that could close unpredictability. There could be language that lists factors along these lines that would exclude these types of stores as opposed to limiting the choices that may be available to tenants under the current guidelines depending on the interpretation of the existing language.

Amenities – Points

Please consider removing the cap from the “Other Amenities” section of the QAP. Removing the cap will allow sites to receive a true score by the number amenities close to the site. That should produce the variation in site scores everyone has been pushing for in the QAP.

Deferred Developer Fees

Please consider that developers must budget the full developer fee and can only defer 40% of the maximum allowable developer fee.

As always, thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Catherine F. Connors". The signature is fluid and cursive, with a long horizontal stroke at the end.

Catherine F. Connors