

Draft 2024 Qualified Allocation Plan Public Hearing Comment Summary

October 10, 2023

Held virtually and in-person via Microsoft Teams Meeting

Comments are listed in the order made. This document is not a transcript but rather a summary of the speakers' main points as noted by NCHFA staff. Not all comments are listed. Please contact Tara Hall with questions about your remarks (tshall@nchfa.com).

Nancy Pearce (CAHEC):

Insurance premium increases have been significant, especially in rural areas. Request for debt deferral committee to be re-established to address some of these challenges or provide one- or two-year deferment of RPP loans to provide some relief.

Allow a special reserve to help curb increases in costs, especially in coastal areas facing large insurance premiums. Require Agency approval to make withdrawals. Any remaining balance at the end of the RPP term to be used to pay down loan balance.

Deni Blackburn (Woda Cooper):

Costs are increasing, but credit limit has not. Increase credit cap closer to \$1.5M/deal.

Second tiebreaker will hurt small communities due to lack of funding available in rural areas and NIMBY
Request bus route requirement change from 6 days a week to 5 days a week

Thomas Urquhart (Urquhart Development LLC):

Increase project credit limit.

If the QAP returns to an incentive for low credits per unit, give basis boost to all sites. Otherwise, the only successful applicants will likely be from DDAs and QCTs.

Likes the new point system for site scores but pushing out to 68 points is a little extreme. It's disadvantageous to smaller communities and Senior sites.

Remove third tiebreaker since the timing of an application submitted does not relate to the best project.

Underwriting standards are not appropriate for today's environment – operating costs and insurance have both skyrocketed. Suggest a tiered system allowing smaller projects with higher limit per unit.

Bryan Hollander (Poplar Development Group):

Thanked the Agency for expanding points pool with broader points to allow for less tie breakers and expand the quality and competitiveness of projects.

If construction cost limits stay, certain categories of hard costs should be considered for exemption (e.g., zoning mandated structured parking, instances where there are supplemental resources available to pay for costs (e.g., ITC credits)).

Consider forward-allocating credits, especially in the Metro pool where timelines for permitting are becoming harder to meet program hard deadlines.

Joseph Kass (NHE, Inc.):

It may be too early to reimpose cost containment. Costs are still increasingly, though at a slower rate.

In favor of the new overall threshold for driving distance scores, which will help prevent tiebreakers and improve site selection.

Generally favorable about new tiebreakers. First helps ensure geographic dispersion. Second helps leverage other funds, especially local with ARPA funds.

Like the bonus point structure, which encourages applicants to pick best development or two.

Have had experience going through conditional zoning and then not receiving an award. Pushing deadline to submit zoning letters to June or July, but still before awards to ensure site is feasible.

Kayla Rosenberg Strampe (DHIC):

Ask that construction cost caps be excluded from QAP.

Request retaining wall requirement be removed or at least allow third party inspectors

Increase non-profit set-aside, which could improve the long-term affordability of properties between years 15 and 30 and after year 30.

Allow a covered porch, in addition to gazebo. Would open up some great infill sites.

Add Goodwill store to shopping category.

Add points for bus stops that are not covered, but that have frequent stops.

Recognize a broader extent of grocery stores. H-Mart is one example of a big store that has history and longevity in the community.

Offer clarification of “non-alternative school” language in the secondary amenities section.

Senior center and public schools get same number of points, regardless of the distance and frequency.

Many more schools than senior centers. Would be great to find a way to allow senior centers to be further away to not disadvantage senior projects.

Jamar Joseph (Greensboro Housing Authority):

Cost cap for projects (chart B) – consider removing or increasing cap based on the market.