

Tara Hall

From: James Maides <JamesMaides@csbenc.com>
Sent: Wednesday, October 2, 2024 12:38 PM
To: Tara Hall
Cc: RentalHelp
Subject: EXTERNAL: QAP Comments

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Hello Tara,

On behalf of Carolina Statewide Development, we are pleased to submit comments on the first draft of the 2025 QAP.

As you may know it has become more and more challenging to find affordable land for LIHTC projects. Most often parcels which meet the site scoring criteria are often the more or most expensive properties within the market due in part to their close proximity to many amenities and usually results in land best suited or most appropriate for commercial development, thus commanding a higher sales price. Please consider expanding the driving distances from 1.5 miles to 2.0 miles to allow an opportunity for new and more affordable properties to be considered for applications.

Secondary Amenities- if the community building remains within the final draft of the QAP, consider reducing the maximum secondary amenity points to 20 rather than 23. There are not many smaller markets that even have a community building which meets the QAP definition let alone being with 1.5 miles of it. We have seen towns that have a community building without schedule activities but that are available for the public's use, alternatively consider broadening the definition of a community building to encompass these types of facilities. Otherwise, we suggest the community building not being such a critical amenity to the overall site score.

Consider creating an additional Service category to separate bank, restaurant and gas station with convenience store and perhaps add other services to the two secondary service categories.

Secondary Primary- consider allowing a general pharmacy/drug store to qualify as an applicant's secondary amenity regardless of whether general merchandise is also sold there. With shopping and a grocery store nearby we don't see the need for a pharmacy to sell additional items which can be found at the grocery store or shopping.

Olmstead Settlement Initiative, section (a)-

Consider eliminating the 15% requirement for the extra 3 points and instead make it just the 7.5% and 10%. With 15% of units being one-bedrooms it impacts the cash-flow and borrowing power for family projects.

We appreciate the opportunity to make comments and for the work that you and NCHFA do to create a balanced QAP each year.

Thank you,
James Maides

