

Chris Austin

From: Traci Dusenbury [tdusenbury@halconcompanies.com]
Sent: Friday, August 30, 2013 12:11 PM
To: rentalhelp
Subject: QAP 2014 comments

Thank you for the opportunity to provide comments. I appreciate the way you worked out the 2013 awards and utilized all of the credits by eliminating RPP in some projects to make it all work. I thought you had a difficult task and did a fair job and I commend the staff on your efforts!

Regarding the 2014 QAP-

1. I do not think that awards should be limited to one per county. This makes it very difficult for developers who may not know if another developer is working in a particular county and most of the counties have several municipalities with markets that can support more than one development. I think this should be limited to two per county, this would allow for an elderly and family in each county.
2. If you do continue to only allow one award per county, then you definitely should not have a list of excluded counties each year. Many of these counties can obviously support more than 1 development every other year.
3. Change section (iii) Site Suitability under Half Mile to "solid waste" landfills currently in operation. Change the section beginning with A Parcel of Right away from 500 feet to 250 feet of the following, as 250 feet is a sufficient distance from these uses.
4. In Development Experience Section, Section IV.D 1. (d)-My first suggestion is-Drop the time period requirement all together and allow a Principal who has developed 10 projects period in NC to get these points. If you won't consider this, my suggestion is to- change the number of awards for a principal to 7 awards or one per year with the current timeframe, or expand the time period to a 10-year period for ten awards. One project a year is surely sufficient in showing that a developer has a strong track record in developing communities in NC and to get a sense of their quality of development.
5. Delete the F 2. General Contractor having to have a principal office in NC, as we do not dictate where other third parties are based and a contractor with a NC contractor's license should be able to build in NC, regardless of where they are located.
6. Provide more differentiation in the site and design scores, so that the tiebreaker of the lowest number of credits per unit doesn't cause the process to be a race to the bottom. This is not beneficial for the program as far as building quality product, nor to the developers who rely on these developments to make a living and support staff. I cannot think of another solution at this time, but I don't like the tiebreaker of lowest credits per unit kicking in and being the decisive factor in who is awarded.
7. Under Rehabilitation Section H. 1. Don't require that the rehab developments have 30% project-based rental assistance. There are many developments out there that need rehabilitation that may not have 30% project-based section 8. Please consider removing this requirement all together or at least allow a mixture of tenant-based and project-based to fulfill this 30% or drop it to 20%.

8. Add Farm Fresh to the list of approved grocery stores that qualify as shopping under amenities. While there may not be many across NC, it does meet the requirements and is comparable to those on the list.

Thank you for your consideration.

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