

## Chris Austin

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**From:** Pope, Eileen M <eileen.m.pope@baml.com>  
**Sent:** Thursday, December 03, 2015 11:49 AM  
**To:** rentalhelp; Chris Austin  
**Cc:** Crown, Nancy  
**Subject:** Comment - 2016 Low Income Housing Tax Credit Qualified Action Plan for the State of North Carolina

Chris,

Thank you for providing the opportunity for developers to submit comments for potential changes to the 2016 Low Income Housing Tax Credit (LIHTC) Qualified Action Plan (QAP) for the State of North Carolina.

Section VI. A.8 of the QAP states that "Owners must prohibit smoking in all indoor common areas, individual living areas (including patios and balconies), and within 25 feet of building entries or ventilation intakes. A non smoking clause must be included in the lease for each household." While Banc of America Community Development Corporation generally supports this statement and our new mixed income and affordable housing developments incorporate this requirement, we respectfully request that the NCHFA make an exemption from the Smoke Free requirement for the individual units for cases where the project's target population are the chronically homeless who are being housed under the Housing First model. Requiring this target population to refrain from smoking in their individual units is really not feasible.

We appreciate NCHFA's consideration of this request for developers wishing to provide housing opportunities to the chronically homeless population of North Carolina.

Sincerely,

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