

# City of Jacksonville

City Manager's Office



May 16, 2014

Mr. Scott Farmer  
NCHFA  
Director of Rental Investment  
PO Box 28066  
Raleigh, NC 27611-8066

RE: Criteria - Housing Tax Credits

Dear Mr. Farmer:

On behalf of City of Jacksonville, I would like to thank you for our recent discussions regarding the criteria for tax credit housing. Over the years, the City has benefited from this program and has created several hundred affordable units for both families and for the elderly. Even so, the City offers the following suggestions which we believe would not only accomplish the goal of quality housing for low income citizens but would also open up a variety of other sites and make them competitive in the ranking process. It is also requested that these suggestion be accepted as an official public comment to be considered in the development of the upcoming Qualified Allocation Plan (QAP).

1. Transit – The current grading system does not give any credit for transit availability or parcels that are located adjacent to transit service. While it does give credit for parcels within 1 mile of a grocery store, it gives no credit for parcels which are on a transit system and located between one and two miles of a grocery store and/or medical facility. Therefore, the following suggestion is given:

Suggestion 1 – Award the same points to a parcel which is within two miles of a grocery store if that parcel is on a transit route which has an established service standard of one hour or less per stop.

2. Schools – The current system does not give points to a proposed parcel relative to elementary schools. While we all recognize that the school transportation system provided by the North Carolina Department of Education will transport students, we must also recognize that neighborhood elementary schools continue to be one of the primary building blocks of the community. Therefore, we make the following suggestion:

Suggestion 2 – Where a parcel is located within 1 mile of an elementary school and where that elementary school has sufficient class space for the projected student impact from the development, points will be provided for that site.

3. Redevelopment Plan – Currently, “green sites” are the primary location for new tax credit housing. This does not assist cities in their overall redevelopment of “brown sites”. Therefore, we make the following suggestion:

Suggestion 3 – Where a parcel is part of an adopted redevelopment plan by a local government and where that redevelopment plan is funded in part or in whole by the Community Development Block Grant program and where that development will receive a minimum of \$100,000 assistance from the city through the Community Development Block Grant program or by fees or facility connection credits, additional points shall be given.

The City believes that these considerations will assist many communities in our common goal of quality housing for our lower income citizens. Thank you for your courtesies. The suggestions are respectfully submitted on behalf of the Mayor and Council of the City of Jacksonville.

Respectfully,



Richard L. Woodruff  
City Manager

cc Mayor and Council  
Reggie Goodson, Development Services Director  
Lillie Gray, Community Development Administrator