

HOUSING AUTHORITY OF THE CITY OF HIGH POINT



October 24, 2014

Mr. Scott Farmer
Director of Rental Investments
North Carolina Housing Finance Agency
3508 Bush Street
Raleigh, NC 27609

Re: Additional Suggested Changes to the Qualified Allocation Plan for 2015 Tax-Credits

Dear Mr. Farmer:

Thank you for the opportunity to propose additional changes to the Qualified Allocation Plan for distribution of 2015 Low Income Housing Tax Credits. As you know, recent changes in the site score criteria had rendered partially completed HOPE VI projects uncompetitive for 9% tax credits. This was primarily the result of the weight placed on site proximity to a grocery store and other shopping establishments. Typically these amenities are not in close proximity to public housing communities. As a result, HOPE VI projects had no avenue for completing approved HOPE VI plans and fully expending programmed HOPE VI funds.

The proposed revision offering the ability to obtain additional points when a project is within 0.25 miles walking distance of a bus/transit stop goes a long way toward allowing HOPE VI sites to earn competitive site scores. However, the requirement for hourly service between 6:00 AM and 7:00 PM seven days a week is an impediment. A cursory review of the transit service in the 7 largest cities in North Carolina revealed that only one city satisfied the requirement for 13 hours of service seven days a week. As a result, it is our recommendation that the bus stop condition be revised to require hourly service on weekdays between 6:00 AM and 7:00 PM. In addition the weekend service requirement should be limited to Saturday from 9:00 AM to 5:00 PM. As a second alternative to the transit requirement, we recommend that service be required six (6) days a week provided the project is within 0.25 miles from a bus/transit stop.

We appreciate this opportunity to offer our thoughts on changes that will enable public housing authorities to continue to replace obsolete public housing with quality mixed income communities.

If additional information is required, please contact me at (336) 878-2375.

Thank you in advance for your consideration.

Sincerely,


Angela G. McGill
Chief Executive Officer

AGM/jd

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