



American Planning Association
North Carolina Chapter

August 22, 2014

North Carolina Housing Finance Agency
Attn: Rental Investment
3508 Bush Street
Raleigh, NC 27609
Sent electronically to: renthelp@nchfa.com

Dear Madam/Sir:

Thank you for the opportunity to submit comments on NCHFA's 2015 Low-Income Tax Credit Qualified Allocation Plan for the State of North Carolina (QAP). I am making these comments on behalf of the North Carolina Chapter of the American Planning Association (APA-NC), a professional organization of 1,400 professional and citizen planners working to preserve and create strong communities throughout North Carolina. We appreciate the opportunity to provide input on your QAP Selection Criteria and Threshold Requirements and offer the following comments.

1) The benefits provided to North Carolinians by affordable housing can be expanded by co-locating such housing close to affordable transportation such as public transit.

While housing is typically the largest cost center in the average household, transportation is often the next most expensive item. As a result, combining affordable housing with affordable transportation such as public transit service can magnify the beneficial impacts on the average household budget and help lower income North Carolinians free up more resources for other important needs. In addition, employers benefit when workers have better access to affordable transportation options.

2) Promote access to transit service by removing the penalty for proximity to railroad tracks in the "Metro" funding category.

Given the benefits of co-locating affordable housing with affordable transit service, please consider removing the penalty for proximity to "frequently used railroad tracks" on the second list of incompatible uses in A.1.(b)(iii) Site Suitability, if the rail corridor is an existing or planned route for public transit service, and the proposed project is located in the "Metro" category.

3) Recognize the social and economic benefits provided by access to public transit service by providing bonus points for access to transit in the “Metro” funding category.

A site near public transit can provide residents with substantial savings on household transportation costs and expand their travel options. In addition, increasing transit use reduces traffic congestion and improves air quality in the community. As a result, we recommend that bonus points be added in Section 6 – Tiebreaker Criteria for transit accessible sites in the “Metro” category, if the proposed project site is located within a ½-mile walking distance of a fixed route public transit stop.

Thank you again for the opportunity to comment on these guidelines. If you have any further questions or comments on them, please feel free to contact me at bhitchings37@yahoo.com or 919/625-1250.

Sincerely,

A handwritten signature in blue ink that reads "Ben Hitchings". The signature is written in a cursive, slightly slanted style.

Ben Hitchings, AICP, CZO
President
North Carolina Chapter of the American Planning Association (APA-NC)

cc: Chad Meadows, AICP, APA-NC Legislative Chair