Tara Meredith

From: Lacava, Katherine Amanda <klacava@unc.edu>
Sent: Wednesday, October 28, 2026 8:12 AM
To: RentalHelp; Quercia, Roberto G.
Subject: EXTERNAL: 2027 NCHFA QAP Comments

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Thank you for accepting comments to the 2027 QAP. I am a City & Regional Planning graduate student at the University of North Carolina at Chapel Hill and have been assigned to comment on this document by Dr. Quercia and Mark Shelburne. My comments are as follows:

IV. SELECTION CRITERIA AND THRESHOLD REQUIREMENTS
(ii) AMENITIES (MAXIMUM 46 POINTS)

"A bus/transit stop qualifies for 6 points, not to exceed the total for subsection (ii), if it is: • in service as of the preliminary application date, • at a fixed location and has a covered waiting area, • served by a public transportation system six days a week, including for 10 consecutive hours on weekdays, and • within 0.25 miles walking distance of the proposed project site entrance using existing continuous sidewalks (excluding the proposed project site) and crosswalks. A bus/transit stop qualifies for 2 points, not to exceed the total for subsection (ii), if all of the above criteria are met except for a covered waiting area."

I appreciate the point value of siting affordable housing near transit stops! However, I suggest removing the 4-point difference between bus stops with covered areas and without. While the presence of a covered transit stop is the goal for all stops an agency serves and makes for a more comfortable transit experience, this element should not outweigh the existence of the bus stop alone, especially considering it must meet these other criteria of serving the stop 6 days per week for 10 hours on weekdays. The bus stop covering also does not diminish the quality of a nearby transit stop, and should that stop now serve more people, there would be a stronger argument for the agency to build a covered shelter. A transit stop, regardless of quality, should count as 6 points for each applicant.

2. CRITERIA FOR SCORE EVALUATION (MAXIMUM 30 POINTS)
(b) Quality of Design and Construction
The Agency will award up to 25 points for new construction projects based on its evaluation of the quality of the building design, and the materials and finishes specified. The following characteristics will be considered:
(i) The extent to which the design uses multiple roof lines, gables, dormers and similar elements to break up large roof sections.
(ii) The extent to which the design uses multiple types, styles, and colors of siding and brick veneer to add visual appeal to the building elevations.
(iii) The level of detail that is achieved through the use of porches, railings, and other exterior features.
(iv) Use of brick veneer or masonry products on building exteriors.

I understand incentivizing applicants to design nice-looking buildings, but I think the maximum point value is inflated. I think awarding up to 25 points purely based on architectural design is not explicitly beneficial to this QAP nor to applicants. I don't think the design of the building should have any effect on its ability to receive LIHTC funds to build low-income housing, and especially not when the design is such a huge point category, because it might influence applicants to sacrifice the number of units or number of bedrooms or other amenities to design a more aesthetic structure for the maximum 25 points. It should reflect the point system of the NEIGHBORHOOD CHARACTERISTICS section, where perhaps 10 points can be awarded if the design meets all or all but one of the criteria, 5 points if it meets 2-3 criteria, and 0 points if it meets 1 or none. This would better align with the rest of the evaluation criteria and place more value on the ability of the buildings to serve a low-income community that needs affordable housing.

Thank you for receiving these comments. The QAP is an extremely important document that has real impacts for the entire state, and it is a great exercise in structuring a competitive program for infrastructure projects.

Best,
Katie LaCava