



November 20, 2012

Mr. Bob Kucab
Executive Director
North Carolina Housing Finance Agency
3508 Bush St.
Raleigh, NC 27609
Sent Via Email

Dear Mr. Kucab:

I have been in conversations with colleagues with the City of Raleigh who are working on strategies to improve affordable housing opportunities in Southeast Raleigh involving both new construction and adaptive reuse of an existing building, that critically depend on the accessibility of low income housing tax credits (LIHTC) and other federal and state tax credits, loans and soft money.

However, because of the way that the 2nd Draft of the 2013 QAP is written, our urban core will be ineligible for these tax credits due to the lack of suburban-style brand-name supermarkets within the proposed 1.0 mile from the site.

Advocates for Health in Action, a Wake-County based healthy weight collaborative, serves as the County's food policy council through our Local Foods and Community Gardens Work Group. This work group is charged with identifying and eliminating food deserts in Wake County, among other tasks. We work closely with partner organizations that are making healthy, local food affordable and accessible to low-income families. We are doing this in part by assisting local farmers markets in their efforts to have Supplemental Nutrition Assistance Program EBT cards accepted.

We also work closely with the Inter-Faith Food Shuttle, a food recovery non-profit that is now working on a project to build economic development AND access to locally grown and healthy food. The IFFS has just opened an urban farm in Southeast Raleigh near to areas that are now considered a food desert in downtown Raleigh.

In addition, Raleigh is growing smaller but bona fide (non-convenience store) local groceries in existing residential areas. This movement needs support through stimulating, not restrictive criteria. If the cities like Raleigh can't access federal money through tax credits, HOME, etc., more residents are going to lack access to fresh food. The "food desert" – "shortage of roof-tops" cycle will continue.

We appreciate everything that NCHFA has done in years past in Raleigh to foster quality affordable housing development. However, we find that the 2nd draft of the QAP and its overly-restrictive grocery/shopping/pharmacy 1.0 mile distance criteria is, in our opinion, counter-productive in areas like downtown where many of the people you propose to serve can most afford to live. With Raleigh on the rise, the location-cost advantage of this market will not last long. Now is the time to locate quality LIHTC development and lock in the affordable rents.

We believe the draft QAP should be amended to include the following changes:

- 1) Change the definition of 'Grocery' in the QAP to allow for grocery providers not listed but are functionally a grocer for the neighboring community as evidence by:
 - a) full selection of vegetables, fruit, meat and dairy products

- b) open for regular posted business hours of at least 8:00 am to 7:00 pm
 - c) the above evidence would be documented by the applicant and submitted to NCSHA prior to the application deadline to determine its eligibility as a Grocery,
- 2) the grocery/shopping/pharmacy driving distances should all be 2 miles for maximum points.

Please consider this change for the Final 2013 Qualified Allocation Plan for 2013, and know that Advocates for Health in Action and its 60 partner organizations are working collaboratively to eliminate food deserts in the City and fully supports efforts to redefine what can be accomplished with regard to simultaneously improving affordable housing and healthy food for our needy communities.

Thank you,



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Executive Director
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