

August 20, 2014

NC Housing Finance Agency
P.O. Box 28066
Raleigh, NC 27611

RE: Comment for 2015 Qualified Allocation Plan

The North Carolina Alliance for Health (NCAH) is an independent, statewide coalition of organizations and individuals advocating for policies that promote wellness and reduce the impact of obesity and tobacco use. NCAH was created in 2002 and now includes over 50 statewide organizational members and partners. NCAH has a strong history of successfully influencing statewide public policy change, including leading the advocacy effort to pass North Carolina's smoke-free restaurants and bars law which went into effect January 2010.

NCAH recommends that North Carolina's 2015 Low-Income Housing Tax Credit Qualified Allocation Plan (QAP) include a threshold requirement for smoke-free policies.

Allowing smoking in multi-unit housing poses health and safety risks for residents as well as staff. Exposure to secondhand smoke is a known and serious health risk. Secondhand smoke can easily travel between adjacent units through walls, doors, windows, air ducts, cracks, and holes. No ventilation system can adequately remove the harmful substances in secondhand smoke from the air. Secondhand smoke is in the same class of carcinogens as asbestos, and the U.S. Surgeon General has stated that there is no safe level of exposure to it. In addition, fires caused by smoking are the leading cause of home fire deaths both nationally and in North Carolina.

Housing residents who are low-income, elderly, or disabled often have chronic health conditions that are exacerbated by exposure to secondhand smoke. Moreover, low-income residents have less ability to move if they are involuntarily exposed to secondhand smoke in their homes. The ability to choose a safe and healthy place to live should not be a privilege reserved for only higher-income individuals. It is important to note that individuals who smoke are allowed to live in smoke-free housing, but they are required to obey the policy and smoke only in places where smoking is allowed to protect their neighbors.

At least seven other states (Arizona, California, Colorado, Maine, Minnesota, Montana, and Rhode Island) include incentives for smoke-free policies in their QAPs. Maine includes smoke-free policies as a threshold requirement, and other states provide 1-4 points for policies prohibiting smoking in residential units, interior areas, and some outdoor areas. We are attaching a chart listing the provision from QAPs in other states incentivizing smoke-free housing.

The North Carolina Alliance for Health works to improve the health of North Carolinians by advocating policies that promote wellness and reduce the impact of tobacco use and obesity.

Many requirements and incentives in North Carolina's existing QAP promote the health and safety of residents. Typically, developers must invest additional money to build housing with features that promote quality of life in order to earn QAP points. By contrast, there is little to no additional cost to developers to open a property with a smoke-free policy over what it would cost to open the property with smoking allowed. Furthermore, smoke-free policies will likely save money over the life of the project in terms of turnover costs, fire damage costs, and insurance costs. Smoke-free policies are thus a win-win for health and business interests.

Given the potential great yields to resident and staff health, along with minimal to no burden on developers, we propose the following threshold requirement for North Carolina's 2015 QAP:

- The applicant must establish and implement a policy prohibiting smoking in all indoor common areas and in individual living areas, including patios and balconies, and within 25 feet of building entries or ventilation intakes. A non-smoking clause must be included in the lease for each household. The written policy must be submitted with the application.

In conclusion, smoke-free policies are in accordance with the North Carolina Housing Finance Agency's values of investing to improve lives and communities and innovating to respond to needs. We believe that smoke-free policies will significantly improve the quality of affordable housing stock available in our state.

Thank you for the opportunity to provide input on the 2015 QAP, as it is an important public health matter.

Sincerely,

A handwritten signature in cursive script that reads "Pam Seamans".

Pamela Seamans
Executive Director
North Carolina Alliance for Health

Qualified Allocation Plans: Smoke-free incentive language

State	Year	Section of plan	Language	Points available
Arizona	2014	Sustainable Development Criteria (up to 20 points)	Enforce a “no smoking” policy in all common and individual living areas in all buildings, and designated smoking area outdoors on property	2
			No smoking on property	4
California	2014	Miscellaneous Federal and State Policies (maximum 2 points)	Smoke Free Residence. The proposed project will contain non-smoking buildings or sections of buildings. Nonsmoking sections must consist of at least half the units within the building, and those units must be contiguous.	2
Colorado	2014	Project Characteristics	No smoking policy. Projects that will institute a no smoking policy for 100 percent of the building, units, and all common areas. Policy needs to be provided at time of application.	1
Maine	2014	Acquisition and Rehabilitation of Existing Housing	Smoke-free Housing. The Applicant must establish and implement a policy prohibiting smoking in all units and common areas of the Project. The Applicant must develop and maintain a written occupancy policy that prohibits smoking in the units and the common areas of the Project, include a non-smoking clause in the lease for every household and make educational materials on tobacco treatment programs, including the phone number for the statewide Maine Tobacco Helpline, available to all tenants of the Project through the resident service coordinator.	Threshold requirement
Minnesota	2014	Application Requirements and Selection Priorities	Smoke Free Building/s: If applicable, provide the written policy prohibiting smoking in all the units and all common areas within the building/s of the project for the term of the declaration. The project must include a non-smoking clause in the lease for every household. The written policy must be submitted with the application and should include procedures regarding transitioning to smoke-free for existing residents and establishment of smoking areas outside of units and common areas if applicable.	1

			Consequences for violating the smoke-free policy are determined by owner but must be included in the written policy.	
Montana	2014	Level 2 Green Items	Smokefree policy that includes all units, buildings, and their respective indoor common areas	1
New Hampshire	2010	Green Development Component (Air Quality)- 25 point maximum	Smoking prohibited in all project units and interior spaces	2
Rhode Island	2014	Evaluative Criteria (Community Impact)	Preference will be given to developments which will institute and maintain a written policy prohibiting smoking in all units and common areas. A non-smoking clause must be included in the lease for each household and the Owner will be required to maintain the smoke-free policy for the term of the declaration. The written policy must be submitted with the application and should include procedures regarding transitioning to smoke-free for existing residents and establishments of smoking areas outside of the units and common areas, if applicable. Consequences for violating the smoke-free policy are determined by the Owner but must be included in the written policy.	Not specified

Other incentives

State	Incentive	Language	Points
Pennsylvania	Tax Credit Program Guidelines 2014	Properties are encouraged to adopt smoke-free policies to protect residents from the dangers of second-hand smoke and to reduce property maintenance costs. HUD, HHS, the American Lung Association and the American Academy of Pediatrics have new toolkits to assist owners with instituting a smoke-free initiative.	n/a
Washington	Evergreen Sustainable Development Standard, performance standard required of all affordable housing projects receiving capital funds from the Washington State Housing Trust Fund	Implement and enforce a smoke-free policy in all common and individual living areas, including decks and patios, in unit leases and within 25 feet of building entries or ventilation intakes.	7