



TRIANGLE J COUNCIL OF GOVERNMENTS

World Class Region

August 22, 2014

North Carolina Housing Finance Agency -- Attn: Rental Investment

3508 Bush Street

Raleigh, NC 27609

Submitted electronically via rentalhelp@nchfa.com

Dear Sir or Madam:

Thank you for the opportunity to comment on the Agency's proposed criteria for the 2015 Low-Income Tax Credit Qualified Allocation Plan (QAP). Triangle J COG is working with its member communities and partner organizations to promote and safeguard housing opportunities for a full range of households as the region adds another million residents over the next generation. We appreciate the NCHFA's valuable role in supporting high-quality affordable housing within the Triangle region and throughout the state.

As we work with partner organizations like ULI-Triangle and Triangle Transit, it is clear that considering both housing and transportation costs in concert can be an effective way to make affordable housing investment decisions that best serve the needs of low-income citizens. We therefore encourage the Agency to review its criteria with an eye to supporting projects that result in the lowest combination of housing and transportation costs for residents.

Three specific recommendations related to site evaluation that might help achieve this include:

1. Under Site Evaluation, section (b) Criteria for Site Score Evaluation, subsection (ii) Amenities: add a column to the table that would grant the highest number of points to projects within ½ mile of groceries and shopping/pharmacy or ¼ mile of a public transit line that directly serves a grocery or shopping/pharmacy. These distances would enable those without cars to access important services. A substantial number of lower-income households have no car available.
2. Modify the criteria under Site Evaluation, section (b) Criteria for Site Score Evaluation, subsection (iii) Site Suitability so that any frequently used railroad tracks that carry or are planned to carry passenger rail service are not penalized (i.e., only freight-only tracks would be penalized). Many desirable residential neighborhoods in our urban centers are located along the rail corridors in our region and having access to current and planned passenger rail service would be a benefit to low-income households. Since it appears that most projects submitted to NCHFA achieve perfect scores, losing any points would seem to disqualify projects. This penalty also conflicts with the scoring used to apply for federal funds for rail transit, which rewards communities for locating affordable housing close to rail transit stations.
3. Add a second exception to the "good" category under Site Evaluation, section (b) Criteria for Site Score Evaluation, subsection (i) Neighborhood Characteristics so that sites within one-half mile of an existing or planned rail transit stop are included in the "good" ranking. Extensive experience demonstrates that locations within a half-mile of rail stops exhibit redevelopment and land cost escalation as rail service is planned and implemented; if these sites are excluded until the neighborhood has largely redeveloped, land will be priced out of the reach of affordable housing developers.

Note that these site evaluation recommendations might be used initially in the Metro category, since the other NCHFA allocation regions may not have the transit or redevelopment opportunities of North Carolina's growing metro regions.

In addition to specific site evaluation criteria, we encourage the NCHFA to review any standards or criteria that might arbitrarily limit the development of good projects, such as limits on non-profit agency participation, especially in metro areas where creative approaches may be needed to address housing cost issues.

The staff at Triangle J COG would be pleased to meet or talk with you to provide any additional information, and offer whatever support we can in assisting the agency in these or related criteria. Again, thank you for the crucial services you provide, and for the opportunity to comment on your standards and criteria.

Sincerely,

A handwritten signature in black ink that reads "John Hodges-Copple". The signature is written in a cursive, flowing style.

John Hodges-Copple

Director of Regional Planning