



November 23, 2021

North Carolina Housing Finance Agency
Attn: Tara Hall
3508 Bush Street
Raleigh, NC 27609

Subject: 2022 QAP 2nd draft comments

Ms. Hall,

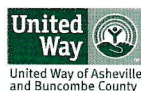
Thank you for addressing the devastating impacts of Tropical Storm Fred in the 2nd draft of the 2022 QAP.

We share the concerns already expressed by others about the late addition of WalkScore to the QAP. While walkability is a very valid characteristic to encourage in affordable housing developments, the usage of WalkScore in the QAP in two different ways (potential to earn 2 points under Site Evaluation as well as the 2nd tiebreaker) places far too much weight on a new metric. As others have commented, keeping WalkScore as currently proposed in the QAP will have unintended consequences and create a barrier to meeting the affordable housing needs of small towns.

If NCHFA desires to keep WalkScore as a selection factor in 2022, we would recommend using it as the 2nd tiebreaker ONLY, such that the higher WalkScore can be the final factor to differentiate two otherwise very good sites.

In future years, we emphasize the strong need for NCHFA to re-evaluate its site scoring techniques (and parking requirements) in a more holistic manner. While the end goal may be to differentiate proposed developments, the QAP site evaluation criteria should also reflect clear, consistent, and evidence-based values for what makes a good affordable housing development. Some questions for further consideration:

- Would a different site-evaluation index be more appropriate for affordable housing development (such as Enterprise Community Partners' Opportunity360)?
- Is WalkScore the best walkability index available to differentiate sites in North Carolina (EPA's National Walkability Index is another alternative)?
- Do any of the retail establishments on the Shopping primary amenity list typically exist in highly walkable areas?

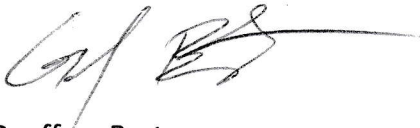


- Do current amenities listed reflect areas that equate to a high quality of life for residents? Should more value be placed on proximity to useful community resources such as parks, schools, federally qualified health centers, or other service providers?
- Does a site with a WalkScore higher than 60 still need a 1.75 parking ratio? What about a site served by public transportation?
- Does it make sense to score amenity proximity by driving distances that exceed comfortable walking distance, while also encouraging walkability?
- Could connectivity via sidewalks to nearby shops, services, and amenities offset a WalkScore that may be lower than the 60 needed for a full 2 points?
- Should the WalkScore points chart for the Metro Region be different than for the West, Central, and East Regions to acknowledge the reality that higher WalkScores exist in more urban counties?

We look forward to working with NCHFA over the coming year to help assess QAP evaluation criteria that reflect the best intentions of all of us in this industry – to create the highest number of safe, attractive, well-located, affordable homes that will serve the most number of low-income families for years to come.

Thank you for your many years of partnership and for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Geoffrey Barton', with a long horizontal flourish extending to the right.

Geoffrey Barton
Director of Real Estate Development
Mountain Housing Opportunities