

# WESTERN NC HOUSING PARTNERSHIP

JOY STRASSEL  
Executive Director

September 27, 2022

To: Mr. Scott Farmer  
Ms. Tara Hall

Subject: 2023 NCHFA 1<sup>st</sup> Draft Comments

Mr. Farmer and Ms. Hall,

We appreciate your time in reviewing our comments relative to the 2023 1<sup>st</sup> draft QAP.

We remain concerned that the Walk Score is the second tiebreaker. Our organization focuses on very rural towns in Western North Carolina. So many of our small towns have been overlooked and we seek to meet the affordable housing needs of all North Carolinians. We have found a number of good sites but the Walk Score precludes most development in rural locales based on a low Walk Score.

The Walk Score *unduly penalizes and marginalizes our rural towns*. Small towns often do not have sidewalks nor are amenities nearby, although they meet the QAP amenity mileage requirements. It is virtually impossible to meet the one-point allocated for the Walk Score and truly impossible to receive two-points in our rural towns.

The Walk Score is fraught with inconsistencies. The automatic sampling that feeds Walk Score is a calculation that will rarely apply directly in a rural area. The Walk Score allocates the highest points to secondary amenities and the lowest points to primary amenities which is contrary to the QAP.

We suggest looking at development cost efficiency. This will level the 'playing field' for all developers.

We suggest the new 1<sup>st</sup> tiebreaker be relative to cost burdened rentals, per 5-year units created, that would address markets with the most acute housing affordability challenges.

We thank you for all the Agency is doing to support affordable housing throughout North Carolina and hope you will take our comments under consideration.

Best Regards,



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