

World Class American Ballet

November 20, 2012

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

Dear Mr. Kucab:

The City of Raleigh is working on strategies to improve affordable housing opportunities in downtown Raleigh involving both new construction and adaptive reuse, 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.

As you know, Raleigh repeatedly ranks as one of the best cities in the United States in which to live and raise a family. In a survey of "urban amenities", downtown Raleigh scored higher than many suburban locations including Cameron Village. The City wants desperately to overcome the downtown "food desert syndrome" and needs your help by changing the QAP.

Raleigh has momentum in 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.

Thank you,

Sincerely,


Lisa Jones

