



American Planning Association
North Carolina Chapter

August 30, 2013

North Carolina Housing Finance Agency
Attn: Rental Investment
3508 Bush Street
Raleigh, NC 27609
Sent electronically to: renthelp@nchfa.com

Dear Madam/Sir:

Thank you for the opportunity to submit comments on NCHFA's 2014 Low-Income Tax Credit Qualified Allocation Plan for the State of North Carolina (QAP). These comments are made on behalf of the North Carolina Chapter of the American Planning Association (APA-NC), a professional organization of 1,400 professional and citizen planners working to preserve and create strong communities throughout North Carolina. We appreciate the opportunity to provide input on your QAP Selection Criteria and Threshold Requirements and offer the following comments.

Comment #1: Combining affordable housing with access to transit service can help reduce household costs and build stronger communities.

North Carolina has 99 transit systems that carried more than 77 million passengers in the past year. Most fixed route systems in the state have seen steady increases in ridership in recent years. Many North Carolinians are using transit for trips from home to work and shopping more than ever before.

The American Automobile Association estimates that it now costs \$9,122 on average per year to own and operate an automobile in the U.S. That translates into more than **\$760 per month** for the average U.S. auto owner and household. This represents a sizable portion of the monthly budget for a lower income household in North Carolina. If such a household were able to save the cost of one auto because of the accessibility of public transit service, it would represent a major reduction in the household's transportation costs, providing more resources for housing and other needs. HUD and other organizations are increasingly using a combined Housing + Transportation Index (H+T Index) when evaluating the cost of living for different populations and neighborhoods.

Where fixed route public transit is available, it is far less expensive for lower income households than auto ownership. For example, the Durham Area Transit Authority (DATA) monthly pass for unlimited travel in the Durham area costs **\$36 a month** or \$432 per year. This system serves all major job and shopping destinations in the community. Likewise, an unlimited Triangle Transit Authority travel monthly pass to go anywhere in the three-county Triangle region on any of six public transit systems costs \$68 a month or \$816 per year. In addition, Durham and Chapel Hill transit systems offer *free bus service* to the largest employers in their city, to the University of

North Carolina (on all routes) and Duke University (on one main route). Being able to ride transit and reduce the need for car ownership can save lower income households a lot of money!

Comment #2: Please revise the points awarded in Section A.1.(b)(ii) Amenities to provide points for access to transit service.

Having access to nearby transit also makes access to shopping and jobs easier and cheaper for residents. This fact is not reflected in the current point system. For example, the ‘Amenities’ section awards points based on site distance to grocery, shopping and pharmacy, with an auto trip required. This does not acknowledge the increased household access and transportation savings to these retail and other important services when the housing site is within walking distance of public transit.

The NCHFA evaluation system should recognize the importance of housing proximity to public transit in helping many NC residents to better afford safe, decent housing. As a result, we strongly encourage NCHFA to assign points for proximity and accessibility to public transit service as a factor to include in the QAP Selection Criteria and Threshold Requirements. In order to do this, we would recommend adding language to the following sections as follows (suggested new text shown as underlined):

A.1.(b)(ii) Amenities – Add text at the beginning that states that :

“Proximity of a site to fixed route public transit can significantly reduce household transportation costs and substantially improve accessibility of many retail services and other destinations to a site. However, such public transit is not available in some communities. When public transit is NOT available to a site, points shall be determined according to the matrix below.”

Then continue with the existing matrix and text regarding the distance to grocery and shopping.

Next, add a new section that states:

“When public transit IS accessible to a site, points will be determined according to the matrix below:

<u>walking (distance in miles)</u>	<u><¼</u>	<u><½</u>	<u><1</u>	<u>>1</u>
<u>Transit Availability (to a stop)</u>	<u>18 pts</u>	<u>12 pts</u>	<u>6 pts</u>	<u>0 pts</u>

<u>driving distance in miles</u>	<u><1</u>	<u><2</u>	<u><3</u>	<u>>3</u>
<u>Grocery</u>	<u>6 pts</u>	<u>4 pts</u>	<u>2 pts</u>	<u>0 pts</u>
<u>Shopping and pharmacy</u>	<u>3 pts</u>	<u>2 pts</u>	<u>1 pt</u>	<u>0 pts</u>

Comment #3: Promote urban infill development and access to transit by reducing the penalty for proximity to high traffic corridors and railroad tracks.

Many N.C. communities are seeing increased urban infill development as developers work to make more efficient use of available land resources. This meets many beneficial community goals, such as increasing housing and transportation choices, promoting better health through

walking, reducing crime, and providing more efficient utilization of existing public facilities and infrastructure.

Such urban infill frequently puts new housing in close proximity to many other types of uses. Modern building codes and new housing construction provide substantial sound insulation that allows many people to reside near noise sources without undue impacts. In addition, high traffic corridors and railroad tracks can also bring other important amenities, such as access to transit service. As a result, in **A.1.(b)(iii) Site Suitability**, we suggest that on the second list of incompatible uses, you *reduce the distance from 500 to 250 feet*. You may want to reduce the distance for all the listed uses, but of particular concern are “high traffic corridor” and “frequently used railroad tracks”, especially when they support current or planned fixed route transit service.

Comment #4: Acknowledge the improved rent affordability that comes with access to transit service by awarding points for access to this amenity.

Given the discussion above regarding the improved purchasing power resulting from access to transit service, we suggest you add a subsection (d) to the end of **B.2. Tenant Rent Levels** text as follows: “(e) Five (5) points will be awarded if the application’s site is located near public transit stops.”

Comment #5: Recognize the other social benefits provided by increased transit use and reduced auto trips by providing points for access to transit in the Special Criteria and Tiebreaker section.

As noted, a site near public transit can give residents substantial savings on household transportation costs. In addition, increasing transit use reduces traffic congestion and improves air quality in the community. As a result, we recommend that points be added for transit accessible sites. In **F. Special Criteria and Tiebreakers**, please add a new subsection as follows: “2. Transit Access – if a site is located within ½ mile walking distance of a fixed route public transit stop, an additional five (5) points may be awarded.”

Thank you again for the opportunity to comment on these guidelines. If you have any further questions or comments on them, please feel free to contact me at bhitchings37@yahoo.com or 919/625-1250.

Sincerely,



Ben Hitchings, AICP, CZO
President

North Carolina Chapter of the American Planning Association (APA-NC)

Cc: Ken Bowers, AICP, APA-NC Legislative Chair
Dick Hails, AICP, APA-NC Legislative Committee