



TRIANGLE J COUNCIL OF GOVERNMENTS

World Class Region

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

Dear Sir or Madam:

Thank you for the opportunity to comment on the Agency's proposed criteria for the 2014 Low-Income Tax Credit Qualified Allocation Plan (QAP). Triangle J COG has been working with its member communities to ensure that we promote and safeguard housing opportunities for a full range of households, especially as the region adds another million residents over the next generation. We appreciate the valuable role that the NCHFA plays in encouraging the development of 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 the best affordable housing investment decisions. We therefore encourage the Agency to review its criteria with an eye to incentivizing projects that result in the lowest combination of housing and transportation costs for residents.

Two specific recommendations that might help achieve this include:

1. Under Site Evaluation, section (b) Criteria for Site Score Evaluation, subsection (ii) Amenities on page 11: 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.
2. Modify the criteria under Site Evaluation, section (b) Criteria for Site Score Evaluation, subsection (iii) Site Suitability on page 12 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 carry the penalty). Many very desirable residential neighborhoods 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.

The staff at Triangle J COG would be pleased 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,

John Hodges-Copple, Director of Regional Planning

www.tjcog.org
919.549.0551
Fax: 919.549.9390