

Summary of Questions, Comments & Responses on the Town of Apex Draft Affordable Housing Plan

The Town of Apex Draft Affordable Housing Plan (Draft Plan) was presented to the public during a virtual presentation on December 17, 2020 at 6:00 PM. A comment form was made available for written comments. The following document summarizes comments received both during the presentation and via the comment form.

Table 1 includes comments received by December 28, 2020 and considered by the Steering Committee. Changes recommended by the Steering Committee based on these comments are included in the Recommended Draft Affordable Housing Plan.

Table 2 includes comments received between December 29, 2020 and January 19, 2021. This table includes comments made during the Planning Board public hearing and additional comments received through the comment form. Additional comments may be received up to and through the Town Council public hearing. Any substantive comments received following the preparation of the staff report will be summarized during the public hearing presentation.

Table 1. Comments received by December 28, 2020 and Considered as part of the Steering Committee's Recommended Draft Affordable Housing Plan

#	Category	Comment	Source	Response	Suggested Change
01	General	Will there be clear construction density and design guidelines?	Presentation	Construction density and design guidelines are not included in the Draft Plan. The Future Land Use Map establishes the vision for future land use in the Town's planning area. The Draft Plan does include recommendations to consider amending the Future Land Use Map to increase residential densities in areas adjacent to transit. This is an action that Town staff are actively working on per direction from the Planning Committee of Town Council. A workshop will be held on January 19 th to review potential amendments. As transit services increase and improve, further amendments to the Future Land Use Map may be considered. Amendments to the Future Land Use Map are always presented through a public hearing before the Planning Board and Town Council with opportunities for the public to provide comments.	None
02	General	Would the Town of Apex have a role in determining who is eligible for affordable housing units or would the Town's main role be to subsidize the building of housing units? Would the Town operate similarly to the Durham Housing Authority?	Presentation	The Town of Apex does not have a Housing Authority, so the Town's role would not be similar to Durham's. Generally, the Town would not have influence over who lives in affordable housing units. As part of providing funding, the Town could make requests regarding levels of affordability of the housing units. The Town may have more responsibility for determining eligibility for recommendations like the Down Payment Assistance Program and Owner-Occupied Rehabilitation Assistance Program, depending on how those programs are implemented and structured.	None
03	General	How can the Town assure that the housing units are not only affordable but also accessible?	Presentation	The Owner-Occupied Rehabilitation Assistance Program includes measures to address needs to renovate homes to address accessibility needs. The Plan does not include specific benchmarks for Senior or Accessible housing units, but as the programs are designed, these measures could be put in place.	None
04	General	Can we obtain a copy of the slide set? If so, how?	Presentation	The slides will be made available on the Affordable Housing Plan web page. An email will be sent to those who have signed up for updates when this material is available.	None
05	General	Will there be any requirements for vegetation and landscaping for affordable housing developments?	Presentation	Affordable housing developments have to meet all of the requirements of the Unified Development Ordinance for landscaping unless those	None

#	Category	Comment	Source	Response	Suggested Change
				requirements are reduced through a zoning condition. Such a condition would require approval by Town Council through a public hearing process with notification to surrounding property owners. At this point, the affordable housing that has moved forward for multi-family housing has met the requirements. There have been some reductions for single-family residential housing.	
06	General	I am hoping to join other residents in stopping this proposed plan. It is a terrible idea and will ruin our community.	Survey	Comment noted.	None
07	General	I think it would be unfortunate if the outcome of all of these actions is to create islands of affordable housing that are not integrated into the life of the community.	Survey	Comment noted.	None
08	General	Great work by all involved! This is much needed in Apex. We need to also keep a strong focus on providing opportunities for next gen to stay in our town. This is a great way to accomplish this!	Survey	Comment noted.	None
09	General	I agree that Apex should prioritize affordable housing in order to encourage and enable a diversity of folks to live in and contribute to our town. The cultural richness from a variety of backgrounds will continue to be an essential component to Apex!	Survey	Comment noted.	None
10	General	This is very impressive. Way to go Apex! Another feather in your cap, this is why I love living here. Thanks so much for focusing on this tremendously important issue.	Survey	Comment noted.	None
11	General	Appendix Public Survey Results: So, 1,250 respondents, 89% were Apex residents...so 1,113 Apex respondents. Apex population is approximately 53,852 as of 2018. 58% of respondents (1,250*.58) = 725 total think the Town should address AH. So, that's...1.35% of Apex's population.	Survey	The survey is a sample of sentiment and is not intended to be a statistical survey. That said, participation is generally high compared to other surveys. The public has additional opportunities to participate through the public draft, public hearings, and through the budgeting process.	None
12	Purpose	Regarding the first question about the Purpose of the Plan, it seems like this is on page 6, not page 4. The middle paragraph ("To accommodate future growth...") on that page is a little confusing to me. Are these meant to be the motivations behind the Vision? I would think that those were covered in the first paragraph. If this paragraph is retained, I would suggest the following edits: To plan intelligently for future growth, encourage a much broader range of home prices, align housing development with other Town, County and State planning efforts, and attract and retain a more diverse population, Apex has set a vision for its future.	Survey	The suggested language clarifies the purpose (on p 6).	P6 – Change sentence as follows: To plan intelligently for future growth, encourage a much broader range of home prices, align housing development with other Town, County and State planning efforts, and attract and retain a more diverse population, Apex has set a vision for its future.
13	Purpose	Page 8: "These Town policies and practices impact the type of housing available and the cost of housing." I completely agree with this statement and encourage the Town to put priority on actions to change Town policies sooner rather than later that add to housing costs and create a narrow community in Apex.	Survey	Comment noted.	None
14	Needs Assessment	Per last bullet on page 16...Historically, Apex didn't want "affordable housing". They implemented all kinds of policies that fly in the face of it...aesthetic controls, alleys, solar requirements, not approving density, etc. They wanted the upper end housing...not the "affordable housing". It's not the fault of the	Survey	Comment noted.	None

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		development community, they didn't bring other stuff before Council b/c it wouldn't get approved.			
15	Needs Assessment	Page 17: "Struggle to find housing of the type they want." That they "want" or that they can afford? I struggle to find what I want, but that's because I want more than I can afford, as do many. It should read, "Struggle to find housing of the type they can afford."	Survey	The Plan is reporting results of the initial survey. The wording reflects what was asked in the survey.	None
16	Needs Assessment	On p. 16 – First bullet (paraphrase) – significant shortage of rental housing that is affordable for low-income households is estimated to be about 2,000 homes now, doubling to almost 4,000 over next 10 years. Second bullet (paraphrase) – presently a total of 3,850 cost-burdened and extremely cost-burdened households in Apex. These are a good start at estimating the gap in affordable homes, both now and projected out 10 years. In addition, we need an estimate of essential workers who work in Apex, but don't live here, in many cases because they can't find affordable homes here. This estimate should be converted to households by accounting for an average of more than one worker per household. The 10-year projection of these totals could be divided by 10 to provide an approximate annual target. It's not unreasonable to expect a number as high as 1,000 additional affordable homes per year using this approximate method. This is illustrative of the type of numeric objective for affordable homes which Town Council members, Town planners and affordable housing advocates could use to track progress on an affordable housing dashboard.	Survey	The Housing Needs Assessment includes the metrics that are most meaningful based on the current and projected situation in Apex. There is not a good way to reasonably estimate the need for units at different price points for homeownership. That is why the needs assessment focuses on the loss of moderate-income families, loss of starter homes, and overall trends in the number of cost-burdened households. The specific data points that are most compelling and informing to the public can be explored and improved upon over time through regional coordination on the Annual Housing Report & Dashboard.	None
17	Vision and Goals	Keep a solid focus on next gen in our goals.	Survey	Comment noted.	None
18	Vision and Goals	On p. 24 – I agree with revised first goal: "Welcome, attract, and retain a diverse population" Please consider updating first goal on p. 3 to be consistent.	Survey	This was an oversight that will be corrected.	P3 – Correct goal to "Welcome, attract, and retain..."
19	Vision and Goals	The recommendations, vision, and goal statements regarding diversity extend beyond the scope of the Affordable Housing Plan. They are not related to housing affordability and should not be included in the Draft Plan.	Presentation	The Steering Committee felt it was important for the Town to be welcoming to diverse residents and established that as the first goal to inform recommendations. Housing and race have been tied to each other for a very long time in this country and the Town is making a bold step to address that in a direct way.	None
20	Vision and Goals	I agree this project needs to be all-inclusive and welcoming.	Presentation	Comment noted.	None
21	Vision and Goals	"Meeting the needs of a diverse housing population, including providing housing that is affordable to people with moderate to low incomes." As stated in a comment earlier, is Apex talking about being in the business of actually building affordable housing units or are they "approving housing that..." instead of "providing housing that..."	Survey	Based on the recommendations, "approve" would be too specific of a term. "Provide" is intended to reflect the Town's typical role of approving as well as providing gap financing, owner-occupied rehabilitation assistance, etc.	None
22	Vision and Goals	Regarding the third question about the Vision and Goals, they do relate to housing needs with the possible exception of "Partner regionally to meet the needs of vulnerable." I recall a steering committee discussion in which service providers strongly recommended that this Plan be tightly focused on affordable housing, specifically, vs. social services, in general. Furthermore, I find it hard to assess if the goals are reasonable and achievable without associated quantified and time-specific objectives.	Survey		P 3 & 24 – Consider revising to "Partner regionally to meet the housing needs of vulnerable populations."

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23	Recommendations	What plans are you making for affordable units for very low income families?	Presentation	Very low income households are typically those that earn 50% or less of the Area Median Income. While the Draft Plan makes it clear that it is important to address the housing needs of very low income households, the Draft Plan does not set quantitative targets for units for specific household income levels. Low Income Housing Tax Credit Gap Financing is the best tool to meet the needs of very low income households. The Draft Plan includes this tool as a recommendation for the Town and further stresses the importance of working with the County to address the needs of households at different income levels.	None
24	Recommendations	Need a recommendation for very low income (less than 50% AMI); this is a HUGE need in the Triangle, and every town should do its share.	Survey	Very low income households are typically those that earn 50% or less of the Area Median Income. While the Draft Plan makes it clear that it is important to address the housing needs of very low income households, the Draft Plan does not set quantitative targets for units for specific household income levels. Low Income Housing Tax Credit Gap Financing is the best tool to meet the needs of very low income households. The Draft Plan includes this tool as a recommendation for the Town and further stresses the importance of working with the County to address the needs of households at different income levels.	None
25	Recommendations	I'd like to see the Town targeting younger, first-time homebuyers.	Presentation	The Down Payment Assistance program recommendation is intended for first-time homebuyers. The Vision and Goals also address diversity including age.	P. 26, 36 – Clarified that DPA is a recommendation for first-time homebuyers.
26	Recommendations	Do you foresee an Affordable Housing Zoning Overlay covering specific areas in Apex, such as the Downtown or other areas?	Presentation	This is not anticipated; however, the Town is looking at the Future Land Use Map and considering amendments to increase residential densities near transit routes. More information will be available during a workshop on January 19, 2021. Any amendments that move forward will also be presented during public hearings to the Planning Board and Town Council.	None
27	Recommendations	There need to be city guidelines around design density and construction material recommendations.	Presentation	For single-family and duplexes, State law prohibits the Town from having requirements for architectural standards in terms of material and quality of development.	None
28	Recommendations	Consider amending the Town's Fair Housing Ordinance to include source of income, in other words Section 8 vouchers, or pass a law to prohibit property managers and landlords from refusing to accept Section 8 vouchers. Section 8 vouchers are the best way to eliminate homelessness. Other cities have done this, but not in North Carolina.	Presentation	The Town does not have authority to prohibit landlords from refusing to accept Section 8 vouchers. Based on our research we don't believe this is a power the state has given to local governments at this time. There are some localities in other states that have anti-discrimination ordinances applying to housing and these may be general enough to encompass section 8 vouchers. Local legislation would be needed for something that goes beyond current state standards.	None
29	Recommendations	I understand the plan concerns housing affordability and not homelessness however if the Town really wants to be bold it should require property managers and landlords to accept housing choice vouchers (section 8) when presented by prospective tenants. Today, a landlord can refuse to accept a voucher which is used by low income people to afford market-rate rental units. Many cities and municipalities across the county have enacted such laws or amended their fair housing ordinance to include source of income as a protected class. None exist in North Carolina although a group of homeless service providers and advocates are pushing for one in Charlotte. Numerous	Survey	The Town does not have authority to prohibit landlords from refusing to accept Section 8 vouchers. Based on our research we don't believe this is a power the state has given to local governments at this time. There are some localities in other states that have anti-discrimination ordinances applying to housing and these may be general enough to encompass section 8 vouchers. Local legislation would be needed for something that goes beyond current state standards.	None

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		studies have shown that long-term rental assistance is the best solution to ending homeless. Expanding the voucher program is a key part of the incoming Biden administration housing plan. One idea is to require any new rental developments to accept vouchers. Property managers and landlords refuse to accept vouchers for many reasons but implicit in their refusal is that they don't want "poor" people or people of color in their properties which are often in high opportunity areas of the town. That is exactly where we want people who have been impacted by racism or poverty to live. Accepting the voucher is not a panacea. There are other reasons why landlords deny applicants (convictions, income, previous evictions, etc..). However if Apex were to do this it would send a strong message to other cities in NC that it does not matter where your income comes from when it comes to paying the rent.			
30	Recommendations	We've made good progress toward the stated goals. Low Income Housing Tax Credit Gap Financing via the Town's Affordable Housing Fund is the best opportunity to spur actual development. Other ideas thus far don't go far enough to provide incentive to developers. Rent at \$1,000 isn't feasible to spur development of 2-bedroom units as it is too far below market. Consider granting land and foregoing water and sewer capital fees and other significant cost reductions for the developer.	Presentation	The recommendation for an Incentive Zoning Condition is intended to increase the feasibility for developers to build affordable units. The specific design of the Incentive Zoning Condition recommendation will create the structure for addressing these types of incentives.	None
31	Recommendations	Good	Survey	Comment noted.	None
32	Recommendations	I would suggest a focus on beautifying the landscape while meeting housing needs.	Survey	Affordable housing developments have to meet all of the requirements of the Unified Development Ordinance for landscaping unless those requirements are reduced through a zoning condition. Such a condition would require approval by Town Council through a public hearing process with notification to surrounding property owners. At this point, the affordable housing that has moved forward for multi-family housing has met the requirements. There have been some reductions for single-family residential housing.	None
33	Recommendations	Yes on walkability! As a young adult who purchased in Apex planning to start a family. After a breakup, I greatly regret moving here and I plan to rent my house and move out of Apex.	Survey	Comment noted.	None
34	Recommendations	Require electric car parking!	Survey	Requirements for electric car parking are included in the Town's Unified Development Ordinance. Currently EV parking is required for parking structures.	None
35	Recommendations	On p. 41 – In the description of Accessory Apartments, there's a proposal for the Town to "pilot a program to provide permanent financing, to be re-paid over time, for the construction of Accessory Apartments that are rented to low-income renters." I think partnering with local community-minded financial institutions to provide these mortgages, under guidelines established by the Town would be more effective. When Habitat-Wake formed similar partnerships with local mortgage providers, it was able to greatly expand its ability to produce affordable homes. Does the Town really want to be in the business of servicing mortgages?	Survey	This recommendation could be implemented through a partnership with Town funding, much like the Owner-Occupied Rehabilitation Assistance Program (Apex Cares). This can be clarified in the plan.	P41 – Implementation box – clarify "Conduct a pilot program to develop 5 affordable units by offering \$50,000 low-cost construction loans. Consider a partnership for management of loans.
36	Recommendations	Just know that a Housing manager will add annually recurring personnel costs, which can be quite burdensome too.	Survey	Comment noted.	None

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37	Recommendations	The staff positions working to implement the recommendations in the Draft Plan should be representative of the populations the Town of Apex is trying to attract and have the ability to address potential language barriers.	Presentation	The comment is noted for further consideration. The Town of Apex is an Equal Opportunity Employer.	None
38	Recommendations	A housing advisory board is more for the town to manage, thereby adding to administrative cost. Also, this may add to the approval process for a project if required to be seen by this board, which usually adds time and thereby additional cost. I'm not suggesting the ideas aren't valid, but I think costs of a housing manager and an advisory board should be quantified and shared.	Survey	The intent is not that development proposals would be required to be reviewed by the Housing Advisory Board. As part of the personnel request and budgeting process, the salary grade for the Housing Manager will be determined. This is public information shared through the budgeting process. More information is available at: www.apexnc.org/Budget . The administrative cost is not anticipated to be paid for using the Affordable Housing Fund. There is a cost of managing and staffing a committee. It varies greatly by the committee and their tasks. There are also advantages to having these types of working committees in place as they can assist with plan implementation.	None
39	Recommendations	It will be important to be intentional about the advisory board. Make sure housing advocates and representatives of non-profits are included, also the faith community.	Survey	Comment noted.	None
40	Recommendations	Under Affordable Housing Incentive Zoning, need to add some language in there that says that unwillingness to include affordable housing cannot, by itself, be grounds for denial of a project. This section is very wishy washy and uses words like "suggest" and "incentive" and then turns around and uses words like "ensure" and "set expectations for developers to provide affordable units or an equivalent fee payment..."	Survey		P32 – "Recommendations for Apex" paragraph has been revised to make it clear that it is an incentive, not a requirement.
41	Recommendations	The section on Affordable Housing Incentive Zoning needs more work. This is essentially saying that a "voluntary" incentive is going to be mandated to get a rezoning through...or you have to pay into the fund, which is extortion given that inclusionary zoning is not a tool allowed by the NC general assembly.	Survey		P32 – "Recommendations for Apex" paragraph has been revised to make it clear that it is an incentive, not a requirement.
42	Recommendations	I am from the Friendship/New Hill community. My family and neighbors owned much land in the area with rich history. A lot of people moved here and developed here not understanding the roots of the community. A place that was once affordable, diverse and all ethnic was welcomed. Now the once majority and now the minority. We can talk about equality, equity etc globally but we must start in the communities that we live and are developing. I have yet to see one affordable community for the people who lived here or would like to live here. Let's get some minority development and diversity.	Survey	Comment noted.	None
43	Recommendations	Good	Survey	Comment noted.	None
44	Recommendations	Yes to making affordable housing tenants not need cars	Survey	Comment noted.	None
45	Recommendations	On p. 45 – The response to my fourth comment on this page in the November draft (p. 56) indicated that the priority of Public Land Acquisition and Sale would be changed to "Mid-Term." Maybe I misunderstand this response?	Survey	This was an oversight and will be corrected.	P43 and P45 – Changed Public Land Acquisition & Sale from Long Term to Mid Term
46	Recommendations	Is there any program that would forgive homeowners in affordable housing a forgiveness of their property taxes for a period of time? I realize that this is a Wake County issue, but if no such program exists, could the plan include an action to work with the County to develop such a program?	Survey	Tax abatement is not allowed under NC law.	None
47	Recommendations	My quick review of the plan did not turn up any reference to the role of HOAs in affordable housing. It would be great if HOAs could provide support for	Survey	The Plan focuses on actions the Town can take and does not make recommendations for HOA actions.	None

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		families in low cost housing in their community. This might include help with ongoing maintenance (e.g., lawn mowing), holiday decorating, landscaping, etc. Thanks!			
48	Recommendations	Good progress toward the stated goals. LIHTC \$ via the Town Annual fund has the best chance of spurring actual development. Other ideas thus far don't go far enough toward providing incentive to developers. Rent at \$1000 isn't feasible to spur development of 2BR units because it is too far below market. Consider granting land and forgoing Water Sewer Capital fees and other significant cost reductions for the developer.	Survey	This is the intent of the Affordable Housing Incentive Zoning recommendation.	None
49	Recommendations	I don't think that we should overlook the issue of parking and landscape. Most families will have multiple cars and most likely will not use the public transportation service.	Survey	Parking requirements and landscaping requirements are addressed in the Town's Unified Development Ordinance. Any reductions or relief from requirements in the UDO would need to be considered through a public hearing process as part of a rezoning.	None
50	Recommendations	Why should we subsidize housing for workers outside of Apex? If you get any subsidy in Apex, you should need to work in apex as well.	Survey	Comment noted.	None
51	Recommendations	No down payment assistance! We shouldn't give someone 20,000 to move to apex!	Survey	Comment noted.	None
52	Action Plan	On p. 46 – Second page under Action Plan is labeled Metrics of Success. I agree that the metrics and targets are critical to measuring progress during implementation of the AHP. The response to my questions about these comments (my fourth through sixth comments on p. 38 of November draft) was: "We make it very clear that these are samples of the types of metrics that can and should be tracked by the Town. We have also (in response to discussion with the Town and the Steering Committee) made it more clear which metrics the Town should merely track vs. set targets for." So, I guess what I'm trying to understand is whether the Affordable Housing Plan will include a set of metrics and specific targets for measuring progress? If either of these will not be included in the Plan, it seems more work will be needed to deliver a plan that is ready to implement. If so, what entities will be responsible for deciding on the implementation metrics and targets, e.g., the new Housing Manager (who won't be in place until the second half of 2021 at the earliest), or a return engagement of HR&A? I was hoping that an Action Plan would lead to tangible results during 2021. Based on the housing needs analysis, I'm convinced that the need is urgent. Note: there are a couple of responses to questions on the Metrics for Success that say: "This will need to be addressed through the implementation process." So, I'm wondering how the "implementation process" is related to the AHP? Does this imply that the AHP is not implementable by itself?	Survey	The AHP establishes a guiding vision and recommendations to address the need for affordable housing in Apex. More work will definitely need to be done to implement each recommendation. This work will be done by Town staff, along with the recommended Housing Advisory Board and regional partners, and with ultimate approvals from Town Council. It is not anticipated that HR&A or other professional consultants will need to be engaged to implement plan recommendations at this time. The metrics in the plan give us a good starting point for measuring success but the intent was to provide enough flexibility that these measures can be refined over time.	None
53	Action Plan	The Sample Target for Equitable impacts of housing programs is "Disaggregated housing program metrics show no racial or other disparities." I realize there may be limited space here, but maybe a couple of examples would be helpful?	Survey	This will be evaluated further as part of the development of each program.	None
54	Action Plan	On p. 46 – Number of households served... "75 newly-developed units serving households at or below 50% AMI receive Town funding or zoning incentives within five years." Would the Town funding come from the affordable housing fund? Is that reflected in the potential allocations on the next page (p. 47)?	Survey	The intent of the sample metric 75 units would be produced through LIHTC Gap Financing or through the incentive zoning overlay The 300 units are of any income level including market rate, so yes it would theoretically be inclusive of the 75 low-income units, but again	None

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				these are not necessarily meant to be targets that all align exactly because they are samples.	
55	Action Plan	On p. 46 – Number of new subsidized affordable units developed “300 units developed or in development within five years” Are these 300 homes in addition to the 75 newly-developed units within 5 years which are serving households in the category above? If these are in addition, would the Town need to allocate additional funds from the Affordable Housing Fund for this purpose?	Survey	The intent of the sample metric 75 units would be produced through LIHTC Gap Financing or through the incentive zoning overlay The 300 units are of any income level including market rate, so yes it would theoretically be inclusive of the 75 low-income units, but again these are not necessarily meant to be targets that all align exactly because they are samples.	None
56	Action Plan	On p. 47 – Response to my third comment on p. 39 of November draft (which corresponds to this page in December draft) reads: “Regarding how recommended programs & their impacts relate to housing need, we do not have a direct estimate. It is fair to say that the production of new rental units across multiple programs is more likely to keep the rental affordability gap from growing, rather than close the gap. We have focused on showing how Apex can use funds already allocated to address housing needs. Specific targets for particular programs, as outlined on the metrics page, should be set by the Town in partnership with the Housing Advisory Board.” My concern is one of the timing of the implementation of the AHP. I would like to see the setting of initial targets for particular programs taking place in the first half of 2021; if necessary, before the Housing Manager is hired and the Housing Advisory Board established. Since ultimately the Town Council will approve the targets, Planning staff along with some members of the steering committee should be well-qualified to propose targets for Council to review and approve. As mentioned before, the issue is one of the urgency and priority of launching these programs as soon as possible. Waiting to launch the AHP-recommended programs until late in 2021 will lose valuable time and momentum. I believe that the AHP provides ample evidence and direction for beginning implementation of multiple parts of the recommended Action Plan beginning in early 2021. Given the estimated gap of well over 4,000 affordable homes now, with the needs of essential workers included (see comment on p. 16 above), and if an average of about 100 affordable homes are added each year, it could literally take decades to fill a gap that could well multiply during that time. To me, this reinforces the need for accurate estimates of the gaps in affordable homes here – both now and projected into the future. There are estimates in the December draft on this on pages 21-21. The estimates on page 21 appear to be limited to cost-burdened renters (not homeowners). The projected additional jobs over the next decade with incomes below \$75,000 is also a good start, but doesn’t account for essential workers already commuting to work here who also would benefit from affordable housing opportunities in Apex.	Survey	Per the response above, the data points provided in the Housing Needs Assessment are the most meaningful to the needs identified in Apex. The full needs assessment is also provided in the Appendix. Early implementation efforts are already underway and the Action Plan now highlights the need for maintaining momentum and prioritizing the hiring of the Housing Manager position.	P47 – Additions made to Action Plan to stress the need for maintaining momentum and hiring a Housing Manager.
57	Action Plan	Page 45: The decision on some of these being near, mid and long term is interesting. Why not tackle the low hanging fruit of accessory apartments first? Also, it seems that "emergency" rental assistance and supportive services should be of high priority, instead of "long-term" along with public land acquisition & sale...	Survey	While all recommendations are worthwhile, they cannot all be accomplished in the near- or mid-term. The accessory apartments recommendation is palatable to the public based on the survey responses, but results in fewer new units than other recommendations.	None

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58	Action Plan	Regarding the fourth question about Recommendations, in general, I think the Plan Recommendations are a constructive start. However, I believe that limiting the funding to the total in the Affordable Housing Fund each year is unrealistic in the 5-10 time frame. I'm basing this on a very rough estimate of filling a gap of at least 7,000-8,000 affordable homes (rehabbed and new) over the next 10 years.	Survey		P47 & Appendix – Text was added to indicate the Town should pursue and leverage other funds beyond the local Affordable Housing Fund. A list of opportunities is provided as a new Appendix.
59	Action Plan	Regarding the fifth question about timing priorities, I "agree," but with the caveat that the need for affordable homes is urgent enough that the near-term goals should be targeted for the first and second half of 2021, i.e., 6-12 months vs. 0-2 years. I go into more detail on that below.	Survey	Given that this is a 10-year plan a near-term period of 0-2 years is reasonable. Recommendations can and will move forward in less time than 2 years.	None
60	Action Plan	Regarding the sixth question about the sample allocation, I "agree," but with the following caveats. First, referring to the explanation given with the third question above, the \$50,000 allocated to Emergency Rental Assistance (ERA) and Supportive Services should be allocated to other affordable housing recommendations, because these services won't produce any additional affordable homes. Second, this allocation is limited to the \$1M collected annually in the Affordable Housing Fund. As pointed out in my final comment on the Action Plan above, this Plan seems to be limited by this \$1M annual budget over the entire time horizon of the Plan. The best that can be expected is "to keep the rental affordability gap from growing, rather than close the gap." I think Apex can and must find ways to significantly reduce the housing affordability gap over the 10-year Plan horizon.	Survey		A second sample allocation has been added so that there is a recommendation for the near-term that removes the funding for ERA & Supportive services. Additional text explains the fund should be prioritized for programs that create new units or preserve existing units. Other possible funding sources are referenced in a new appendix.
61	Action Plan	On p. 46 – I'm repeating my first comment on this page (p. 38) of November draft. Given that hiring a Housing Manager and setting up a Housing Advisory Board are high priority/ near-term objectives, I would urge Town Council and staff to expedite these two actions, so they're in place during the first half of 2021. I understand the comment about the normal personnel process being tied to the next fiscal year budget, but hiring the Housing Manager and appointing HAB members are in the critical path for implementation of the plan which is even more essential with the pandemic and related economic impacts. Surely, these circumstances would warrant exceptional treatment? In addition, 2021 is an election year, so it could be beneficial for incumbents to point to these early accomplishments.	Survey	Hiring a Housing Manager prior to July 2021 would require use of the Affordable Housing Fund, which is not the main priority. It is also not desirable to rush the hiring process too much and risk not finding the best candidate. Steps can be taken to prepare for the position and target a start date in early July.	Text has been added to the Action Plan, Housing Manager recommendation, and Metrics of Success pages to reiterate this is a critical milestone and should move forward efficiently.
62	Action Plan	An expedited transition from planning into implementation. The three updates you (Shannon Cox) provided on 12/17/20 are impressive. Maybe the raised awareness of the Mayor and Mayor Pro Tem, as a result of their participation on the steering committee, led to a smoother approval of the major funding for DHIC's Broadstone Walk project? My concern is what happens in early 2021 right after the Plan is approved? Here are the practical constraints and dependencies that I picked up as I read over the December draft: <ul style="list-style-type: none"> • The Housing Manager position won't be funded until the new fiscal year which begins July 2021. So the position can't be filled until the second half of the year. • The Housing Manager needs to be in place before the Housing Advisory 	Survey	Hiring a Housing Manager prior to July 2021 would require use of the Affordable Housing Fund, which is not the main priority. It is also not desirable to rush the hiring process too much and risk not finding the best candidate. Steps can be taken to prepare for the position and target a start date in early July.	Text has been added to the Action Plan, Housing Manager recommendation, and Metrics of Success pages to reiterate this is a critical milestone and should move forward efficiently.

#	Category	Comment	Source	Response	Suggested Change
		<p>Board can be constituted.</p> <p>I understand the need for a Housing Manager to provide the dedicated support needed to implement housing initiatives. I've been saying this for at least the last year. Since that hiring appears to be in the critical path, I wonder what could be done to bridge the funding gap until the second half of 2021? For example, could funds in this year's Affordable Housing Fund be used to temporarily fund a Housing Manager until the next fiscal year budget is in place? Are there any funds in this fiscal year's budget that won't be spent due to the COVID pandemic that might be allocated to temporarily fund the Housing Manager position?</p> <p>Regarding the Housing Advisory Board, I wonder whether some of the steering committee members might be willing to help out on a temporary basis until the HAB members are appointed? With the SC members' involvement in the creation of the Affordable Housing Plan, it should be relatively easy for some of them to serve in transitional roles from the Plan approval until the HAB is appointed?</p>			
63	Action Plan	I completely agree with...Urgency to hire a Housing Manager position early in 2021. While I realize it is not yet in the approved budget, I also know there are ways to deal with that and I believe this will be the most important move to give momentum to the plan. It is a critical step and needs to happen as quickly as possible.	Email	Hiring a Housing Manager prior to July 2021 would require use of the Affordable Housing Fund, which is not the main priority. It is also not desirable to rush the hiring process too much and risk not finding the best candidate. Steps can be taken to prepare for the position and target a start date in early July.	Text has been added to the Action Plan, Housing Manager recommendation, and Metrics of Success pages to reiterate this is a critical milestone and should move forward efficiently.
64	Action Plan	Is the Town planning to hire a Housing Manager?	Presentation	Staff will be requesting the Housing Manager position through the annual budget process. It will be Town Council's determination as part of the budget process whether and when a Housing Manager position will be created. The budget will not be approved until June 2021.	None
65	Action Plan	Appendix Public Survey Results: I don't see the timeline of near, mid and long term reflecting these responses. Seems that supportive/emergency services and ADU's (accessory apartments) should be higher priority on the timeline.	Survey	Supportive services and ADUs were some of the more supported tools based on the initial public survey. The Steering Committee recommended "long-term" priorities for these given the other sources of funds for supportive services and the relatively low number of units anticipated to be created through ADUs.	None
66	Action Plan	<p>Estimates of total gap(s) in need for affordable homes. I believe we need accurate estimates of the need for affordable homes to drive the programs and priorities. The Action Plan's recommendations, proposed metrics and sample budget allocations in the draft Plan are a great starting point. But the need is much greater than what the sample allocation implies to be at most about 100 homes a year. I think the key is in the response I quoted above: "It is fair to say that the production of new rental units across multiple programs is more likely to keep the rental affordability gap from growing, rather than close the gap. We have focused on showing how Apex can use funds already allocated to address housing needs."</p> <p>I was hoping and praying that this Plan would envision filling the affordability gap over a reasonable timeframe, say, 5-10 years, and tapping into resources beyond the penny tax, e.g., an affordable housing bond along the lines of what Durham and Raleigh have recently passed, and the possibility of far-sighted</p>	Survey		P47 & Appendix – Text was added to indicate the Town should pursue and leverage other funds beyond the local Affordable Housing Fund. A list of opportunities is provided as a new Appendix.

#	Category	Comment	Source	Response	Suggested Change
		<p>business leaders and community-minded philanthropists providing additional resources.</p> <p>From a political standpoint, I understand that it might be easier to marshal support for additional resources once there are a couple of success stories to point to?</p>			
67	Action Plan	I also agree we need to develop strategies to increase the funding for affordable housing action by the town beyond the \$1M from the additional tax. I believe there are opportunities for public/private partnerships.	Email		P47 & Appendix – Text was added to indicate the Town should pursue and leverage other funds beyond the local Affordable Housing Fund. A list of opportunities is provided as a new Appendix.
68	Action Plan	...The funds set aside for services or for rental assistance should not be taken from the \$1M. Services are crisis response and I believe these funds need to be directed toward long-term sustainable solutions. The outcome for these funds needs to focus on 1. New units of affordable housing or 2. Maintaining current affordable housing stock. Services and rental assistance are necessary to be sure, but it does not impact an increase of affordable housing.	Email		Provide both a near-term and long-term sample allocation.
69	Action Plan	I am extremely concerned about the long-term affordability of a plan such as this. As an Apex homeowner, I am concerned that the costs of a program like this will require me to pay a lot more in taxes to support in the long run, which will in and of itself make my home unaffordable for our family.	Survey		P47 & Appendix – Text was added to indicate the Town should pursue and leverage other funds beyond the local Affordable Housing Fund. A list of opportunities is provided as a new Appendix.
70	Action Plan	What will implementation of the Affordable Housing Plan cost in taxpayer dollars?	Presentation	The total cost to fully implement the Affordable Housing Plan has not been quantified; however, the Town Council created an Affordable Housing Fund in Fiscal Year 2020 that is anticipated to generate approximately \$1 million per year. The sample allocation of funds included in the Action Plan is based on the assumption that \$1 million per year will be available to advance Plan recommendations.	P47 & Appendix – Text was added to indicate the Town should pursue and leverage other funds beyond the local Affordable Housing Fund. A list of opportunities is provided as a new Appendix.

Table 2. Comments received between December 29, 2020 and January 18, 2021

#	Category	Comment	Source	Response	Suggested Change
71	Process	The Town should review successful programs in other jurisdictions rather than recreate a program from scratch. For example, Durham just successfully adopted a new housing policy and there are numerous other jurisdictions with affordable housing plans in place long enough to provide best practices.	Planning Board Public Hearing	The consultant team includes experts in the field with experience drafting other local and regional Affordable Housing Plans. Town staff are collaborating in regional efforts to address affordable housing.	None
72	Process	We applaud the Town for their efforts to address the issue of housing affordability. No doubt, this was especially challenging to kick off in a year such as 2020 played out to be. That being said, the timing of this draft becoming available for public comment was very poor. It was basically put out there over the holiday season with an expectation to squeeze in two public hearings 2 weeks apart with a potential final vote on January 26th. This is not a recipe for getting meaningful public input on the document or to potentially incorporate those comments into a second draft.	Planning Board Public Hearing	The development of the Affordable Housing Plan was guided by a Public Engagement Plan and opportunities for input throughout the nine-month process. The Draft Affordable Housing Plan was made available for review and comment between December 4, 2020 and January 26, 2021.	None
73	Process	Secondly, the stakeholder group should have included the private residential building industry if there is an expectation to strongly encourage them to utilize affordable housing incentive zoning. The Home Builders Association of Raleigh-Wake County is a great resource to provide member volunteers who do business in Apex and can provide useful insight and perspective. This was a missed opportunity.	Planning Board Public Hearing	The Triangle Community Coalition (TCC), a strategic partner of the Home Builders Association (HBA), was represented on the Steering Committee. The HBA was included on all public communications, and market-rate developers were included in the stakeholder interviews. The process was intended to balance the many perspectives and stakeholders of the Affordable Housing Plan. The HBA will be included among the stakeholders in the drafting of the Incentive Zoning Condition Policy.	None
74	Process	As a Latino, I'm highly offended by the use of the Term LatinX as a placeholder in the presentation. While I understand and appreciate that the document is trying to be inclusive, you've chosen gender identification OVER my culture and heritage. The Spanish Language by default is a masculine and feminine...and using this term is taking the Latin out of Latino (i.e. how is it pronounced, the "a" is no longer pronounced the same...it's no longer Spanish but an English construct). I would explore more about the acceptance of "Latinx" in the Latino community...it's deeply disliked.	Survey	Based on feedback received during the initial public survey, and research into concerns presented then, documents and presentations use Latino/Latina/Latinx to attempt to represent the varied perspectives on this issue. Use of Latinx alone would have been a reference to early plan documentation.	None
75	Vision and Goals	This is good.... especially the Regional Vision	Survey	Comment noted.	None
76	Needs Assessment	The biggest concern I see is the lack of defining what is "affordable housing" to Apex. I see HUD's definition and the types, but what is it to Apex? Housing affordability, missing middle, 80% AMI, 60% AMI, market rate, 30% housing costs of income, all of the above, etc? Trying to establish market rate components, which are likely the most suitable as they are the least subsidized, means council members trying to assess each project case by case on what affordable is as development occurs. That can be unpredictable and may cause challenges with the development community and ultimately hinder development, which increases demand thus raising prices and increasing the housing affordability issue. Having a clear definition and clear incentives is critical to make progress on the affordability issues. In summary, Apex is a great community in which many people want to live. Hence the strong demand and challenging affordability. However, Apex has a wonderful staff and a passionate and active council that I have complete confidence can preserve and enhance the ability for all individuals to live in Apex.	Survey	The Summary of Housing Needs on page 16 is intended to briefly capture those needs related to affordable housing that were found to be the most pressing issues for Apex. The Incentive Zoning Condition policy, when drafted, can be more specific related to specific ranges of area median income. The Metrics of Success on page 46 do include some specific sample targets for specific income levels; however, these are intended to be flexible and adjusted by the Housing Advisory Board.	None
77	Needs Assessment	Before proceeding further with the Plan, the Town must set clear policy and priorities for the need being served. As noted in the Plan, there are multiple strata of housing needs and each requires a different set of actions.	Planning Board Public Hearing	The Summary of Housing Needs on page 16 is intended to briefly capture those needs related to affordable housing that were found to be the most pressing issues for Apex. The Incentive Zoning Condition policy, when drafted, can be more specific related to specific ranges of area median income. The Metrics of Success on page 46 do include some specific sample targets for specific income levels; however, these are intended to be flexible and adjusted by the Housing Advisory Board.	None

#	Category	Comment	Source	Response	Suggested Change
78	Needs Assessment	It is clear and accurate. I would love to see a REGIONAL PLAN. Every city/town big and small has the same issues with affordability. Yet, every city/town forms a committee, pays a consultant. does "the study." This same thing was completed in Cary 10 to 15 years ago. I was on the TCAP "Town Center Area Plan" Committee. What I'm reading in this report is much the same. I Realize all towns are different and the political will ebbs and flows. As a builder doing primarily infill a common set of guidelines to support affordable housing would be nice. As a downtown Apex resident I see the gentrification coming on FAST. I wish I had perfect answers... This form is a great start! Thank you. I was involved in an affordable housing plan in Downtown Cary 21 townhomes units in partnership with DHIC they provided down payment assistance with income limits. 30% median income if I recall correctly.	Survey	Comment noted.	None
79	Recommendations	<p>Diversity and Racial Equity Initiatives (page 30)</p> <p>This section deals with many diversity issues that are beyond the scope of any need to increase the availability of affordable housing. The Steering Committee that drafted this plan has stepped beyond the goal of providing a plan for affordable housing and has introduced several policy issues pertaining to social and morality diversity that are not germane to the issue of housing affordability. This section inappropriately includes reference to diversity policies based upon race, ethnicity, personal beliefs, sexual orientation, and gender identity. Such policies have no direct relevance to housing affordability should be completely removed from this Plan.</p> <p>In addition, I speak now to those diversity policies proposed in this section of the Plan. I speak to the statement, "Racial equity initiatives acknowledge the intentional design of many racial inequities..." In this country racism is now abhorrent to almost everyone. We are to be proud that we as a country have effectively reduced racism to the point that those individuals who are racist have no substantial power in this country. The diligent efforts of the black community have very effectively reduced racism in this country to a very small minority, and race is not tolerated as a legitimate basis for discrimination. I do not see evidence that there is "intentional design of many racial inequities." There should be equality of opportunity, i.e., decisions should be blind to race, and that is what we have now in this country. Today in this country, one is free to pursue whatever he wants, free from racial discrimination. This has been described by many as the most profound moral accomplishment in history, for no other country has been able to rectify this moral sin like the US has.</p> <p>I am opposed to setting "racial equity goals." There should be no initiatives to force some type of racial balance. The achievements and accomplishments of a free man, including the black man in this country, are his own doings. They are not impeded based upon his race. It is good to remove any policies that currently intentionally favor someone based on the person's race, such as "affirmative action" policies.</p> <p>Regarding diversity initiatives, we should be strongly opposed to promoting any type of balance initiatives that encourage immoral sexual orientation or behavior, confused gender identities, or any other groups that are embrace immoral behavior as determined by the standard of the Holy Word of God as contained in the Bible. Such immoral "diversity" is not to be encouraged and is not a thing to be pursued within this Plan.</p>	Survey	Diversity and racial equity were purposefully and intentionally included in both the vision and goals and the recommendations by the Steering Committee.	None
80	Recommendations	<p>Multiple: Town Staff Capacity (page 27), Housing Advisory Board (page 28), Diversity & Racial Equity Initiatives (page 30)</p> <p>The Town of Apex Affordable Housing Plan is focused on increasing the diversity of the citizens in Apex. Narrowing this focus to housing will not improve citizen diversity. Apex needs a more holistic approach to this goal.</p> <p>Apex has spent years legislating for higher pricing homes by requiring certain aesthetic controls, development standards, low density and solar requirements. These requirements add costs to housing and lead to a lack of "affordable housing". The goal at the time these requirements were enacted was to increase housing</p>	Planning Board Public Hearing	Diversity and Racial Equity Initiatives are included among the Plan recommendations. "Welcome, attract, and retrain a diverse population" is listed among the Plan goals. Diversity in these references includes, but is not limited to, racial and cultural diversity. Also, while a part of the plan, this is not the only focus of the plan. The Steering Committee strongly recommended prioritizing the hiring of a Housing Manager and establishing the Housing Advisory Board to carry out all of the plan recommendations. The	None

#	Category	Comment	Source	Response	Suggested Change
		<p>assessments to expand the tax base and limit “certain” kind of home. The first step to increasing diversity in housing should be to roll back these high cost requirements.</p> <p>The second step to increase citizen diversity would be to improve town cultural offerings that are targeted to certain demographics. If you review the town’s list of programming, there is absolutely no offerings of cultural activities geared toward minorities. Instead of wasting taxpayer dollars on a housing manager, the town should focus on utilizing existing staff to plan a more diverse cultural program offering.</p> <p>The third step to increase citizen diversity would be through economic development. The town has four staff members on the economic development staff. These staff members could recruit minority owned businesses. The town could subsidize the rent for minority owned businesses in the Coworking Station. The town could set up a grant to help minority owned business buy building to expand their businesses.</p> <p>The fourth step to increase citizen diversity would be through staff recruiting and development. Recruiting to fill town staff positions through minority-based colleges, churches or organizations. Creating scholarship programs for minority citizens to attend the law enforcement academy or the community college for a trade education.</p> <p>The Town of Apex has several boards and committees that can successfully managed a diversity and inclusion plan. A Housing Advisory Board is not needed. The Planning and Community Development Board, the Parks, Recreation and Cultural Resources Advisory Commission and the Public Arts Committee along with the Economic Development Department can work together to successfully address the issue of citizen diversity in the Town of Apex.</p> <p>Thank you for your time and I look forward to hearing from you with any questions you may have.</p>		<p>comments regarding incorporating diversity and inclusion across Town departments has been shared with Town Administration.</p>	
81	Recommendations	<p>Incentive Zoning Conditions (page 32)</p> <p>While I support having affordable, equitable, and quality housing for all, I am concerned with the incentive zoning components. The first sentence includes the sentence "the town has the opportunity to ensure that new development includes affordable housing." "Ensure" does not read as an option, but more as a requirement. Furthermore, the only town listed options for incentives were increased density and reduced parking requirements/setbacks. Having increased density is a great way to provide more housing and increase supply which helps combat cost increases. However, not every site has the opportunity to increase density. The existing RCA, perimeter buffer, stream buffer, stormwater requirements per the UDO utilize a great deal of developable area that in many cases the density is already at its capacity from what a site can yield horizontally. I would offer the increased density is likely more pertinent to apartment/condos however, if the land is maximized horizontally, then the only option is to go vertical. This is possible, but this likely transitions an apartment from a garden style to an internal corridor, elevator and possible not stick built. These components equal more costs and likely equate to the demand for higher rents, which in turn may provide some affordable housing units, but also increases the cost of the other units. Ultimately, higher density may not be a great incentive to developers if the density is not feasible.</p> <p>The other option is parking reductions. This may help in a few specific circumstances, but if you apply this to townhomes, then you may be compounding concerns from staff regarding citizen complaints of nowhere to park. I would also add SF homes in Apex rarely have reduction needs, so there is not much incentive present. Parking reductions typically work well if there is dependable public transit in which communities are not car dependent. I do not believe Apex is set up on a large scale for that, thus not making this incentive a wide scale incentive.</p>	Survey	<p>The two types of incentives shown as part of this recommendation are examples only. Other types of incentives could be considered when the Incentive Zoning Conditions policy is drafted. The language is intended to reflect that the policy should be designed in a way that ensures developers are able to provide affordable housing. The alternative wording to clarify the intent and remove the use of “ensure” that was presented to the Planning Board will also be provided for Town Council consideration. The plan does not establish policy. When the Incentive Zoning Condition policy is drafted, it will be within the bounds of State law.</p>	<p>P32 – Revised wording clarifies that incentive zoning is not a requirement and that the two types of incentives listed are examples only.</p>

#	Category	Comment	Source	Response	Suggested Change
		<p>I understand this document states that the goal would be to establish a clear policy for Apex for incentive zoning, but I was hoping that is what this documents would do. I think the goals are good, but there is a strong demand for housing and a strong demand for affordability so the quicker the better.</p> <p>In developing the future "policy setting expectations for developers to provide affordable housing" (again doesn't sound optional) I think it would also be wise to consider incentives like waiving the architectural requirements that Apex requires that add cost. I think you could consider waiving/reducing the amount of fees that are associated with development. There are some high fees that a reduction in those would seem more of an incentive to the masses and could be substantial in providing more affordability.</p>			
82	Recommendations	<p>Incentive Zoning Conditions (page 32)</p> <p>The Incentive Zoning and "Soft Density" By-Right Zoning are very effective tools at providing additional housing units, directly and indirectly influencing affordability. By-right zoning can bring units to the market more efficiently (both in terms of time and dollars) and can be applied throughout the Town. Incentive zoning is also a useful tool, if used properly. In North Carolina, where inclusionary zoning is not permitted, the incentives must be tailored to actually produce affordable units ("affordable" should be specifically defined) and should include more than just bonus density, such as waiver of UDO standards, reduction or elimination of fees and/or expediated approvals. Specifically, because such conditions are voluntary, affordable housing proffers must be just that, proffers, not the price of the rezoning: all projects cannot support significant affordable housing obligations and if a one-size-fits-all standard becomes the norm, there will less impact than otherwise could be produced. Finally, the architectural conditions traditionally applied in zoning proceedings have the unintended consequence of preventing affordable units because the smaller the unit, the more affordable; however, the garage requirement, among other elements, prohibit smaller homes with a two car garage.</p>	Planning Board Public Hearing	The two types of incentives shown as part of this recommendation are examples only. Other types of incentives could be considered when the Incentive Zoning Conditions policy is drafted. The language is intended to reflect that the policy should be designed in a way that ensures developers are able to provide affordable housing. The alternative wording to clarify the intent and remove the use of "ensure" that was presented to the Planning Board will also be provided for Town Council consideration. The plan does not establish policy. When the Incentive Zoning Condition policy is drafted, it will be within the bounds of State law.	P32 – Revised wording clarifies that incentive zoning is not a requirement and that the two types of incentives listed are examples only.
83	Recommendations	<p>Incentive Zoning Conditions (page 32)</p> <p>In reading the draft plan, it suggests the use of affordable housing incentive zoning as a way to achieve affordable housing units. The use of this zoning would presumably be voluntary given that required inclusionary zoning is illegal in North Carolina. However, the word "voluntary" is not in the document at all and instead, words and phrases like, "ensure" and "sets expectations" are used, which sound more required than voluntary. We request that the Affordable Housing Plan incorporate clear language that states that the unwillingness or inability to include affordable housing units (or payment in lieu) cannot, by itself, be grounds for denial of a project. The economics just cannot work for every project out there, especially the smaller in scale they are.</p>	Planning Board Public Hearing	The two types of incentives shown as part of this recommendation are examples only. Other types of incentives could be considered when the Incentive Zoning Conditions policy is drafted. The language is intended to reflect that the policy should be designed in a way that ensures developers are able to provide affordable housing. The alternative wording to clarify the intent and remove the use of "ensure" that was presented to the Planning Board will also be provided for Town Council consideration. The plan does not establish policy. When the Incentive Zoning Condition policy is drafted, it will be within the bounds of State law.	P32 – Revised wording clarifies that incentive zoning is not a requirement and that the two types of incentives listed are examples only.
84	Recommendations	<p>Accessory Apartments (page 41)</p> <p>ADU's will required more cooperation and perhaps a different set of setbacks and other Dimensional Standards changes to make the numbers work.</p>	Survey	This input will be used to inform implementation of the Accessory Apartments recommendation.	None
85	Recommendations	<p>Accessory Apartments (page 41)</p> <p>I strongly support the program of "Encouragement of development of accessory apartments ". I think this idea has a good potential of accomplishing the desired goal. In this regard, I beg to draw your attention to two challenges and request you to work on them if you haven't already:</p>	Survey	This input will be used to inform implementation of the Accessory Apartments recommendation.	None

#	Category	Comment	Source	Response	Suggested Change
		<p>1. Utility companies are known to oppose "sub-metering". So some support will be required from planning/utilities departments for providing a way to meter the resident of accessory apartment, for electricity & water.</p> <p>2. Accessory apartments are currently restricted to 25% of the total square footage (Ordinance section 4.5.2.A). Assuming that a reasonable accessory apartment will be around 800 sq ft in size, it implies that the main dwelling unit must be 3200 sq ft or bigger in size. I think a family that can afford a 3200 sq ft home in Apex area in today's time will probably not be driven to generate extra wealth from an accessory unit. I mean, a family that lives in a 2000 ~2400 sq ft home with sufficient lot size is more likely to be motivated to take the pain of building a 700~800 sq ft accessory apartment, which is possible only when 25% size restriction is increased to at least 33%.</p>			
86	Recommendations	<p>Multiple: Soft Density By-Right Zoning (page 43) and Accessory Apartments (page 41)</p> <p>My thoughts & a couple of questions most pertaining to infill lots located in Downtown Apex. The downtown area is at a precipice of major gentrification which of course is the exact opposite of affordable housing.</p> <p>1. As land prices soar builders must build bigger & bigger homes on smaller lots to justify the square footage value of the lot price. Currently around \$125k to \$200k.</p> <p>2. The charm of Downtown Apex will remain in tact assuming there is tight architectural control combined with higher density.</p> <ul style="list-style-type: none"> • Downtown Apex Small town Character UDO permits a min. lot width of 60'. Compared to other adjoining jurisdictions min lot size 5,000 sf, min width at 50' with 3' side setbacks. 6' aggregate. Medium Density Residential MDR width = 40' • Relaxing the min lot width could help with affordability allowing smaller lots. It would also help with density for public transportation (assuming these folks would use public transportation.) but the bigger issue would be to reduce "super high priced homes" and the continued gentrification of the downtown area, due to the large single family lots. Yes it would protect the existing housing stock and charm keeping the min lot width at 60'. • Political will to reduce lot widths? Staff would have to agree. • The town is encouraging ADU's (accessory Apartments) as mentioned in the preliminary affordable draft plan on pg. 41. • Assuming this counts as an affordable rental. <p>3. Affordability has a shot assuming a combination of:</p> <ul style="list-style-type: none"> • Increased density. Townhomes, Duplexes, Triplexes. • Public - private partnership • Discounted fees in exchange of for a % of units committed to buyers that meet the Wake county Threshold 30%. • Down payment money that can be forgiven after a period of time. 	Survey	These specific comments will be considered as part of Plan implementation.	None
87	Action Plan	The Plan's implementation schedule ignores certain low-hanging fruit, such as by-right zoning, accessory apartments, and housing assistance. These elements can be implemented quickly and have immediate and direct impact.	Planning Board Public Hearing	Since it is not possible to move forward all recommendations in the near-term, the action plan prioritizes those recommendations that are anticipated to result in the most affordable housing units and/or are most needed now.	None
88	Action Plan	Lastly, we are perplexed by the prioritization in the Action Plan section under the Matrix of Recommendations. We would recommend putting low hanging fruit such as the Accessory Apartments and "Soft Density" Zoning By-Right in the near-term timeline as well as Emergency Rental Assistance and Supportive Services given its urgent nature.	Planning Board Public Hearing	Since it is not possible to move forward all recommendations in the near-term, the action plan prioritizes those recommendations that are anticipated to result in the most affordable housing units and/or are most	None

#	Category	Comment	Source	Response	Suggested Change
				needed now. Emergency Rental Assistance is currently being supported through other resources.	
89	Action Plan	Action plan is a very good start and detailed enough...of course execution is key.	Survey	Comment noted.	None