



Buncombe County Affordable Housing Subcommittee

Amanda Edwards
Chair

Parker Sloan
Commissioner

Drew Ball
Commissioner

Meaghan Austin
Member

Joe Decredico
Member

October 8, 2026

North Carolina Housing Finance Agency
Attn: Tara Hall
3508 Bush Street
Raleigh, NC 27609

Subject: 2026 Qualified Allocation Plan Comments

Dear Ms. Hall,

As the Chair of the Buncombe County Board of Commissioners and the Affordable Housing Subcommittee, I would like to offer comments and suggestions for the 2026 Qualified Allocation Plan. Buncombe County values the impact of the Low-Income Housing Tax Credit program and will continue to support efforts to bring more quality affordable housing to our region.

Most present on the minds of our residents is the impact of Tropical Storm Helene in September 2024. In addition to the devastation to the environment, economy, and infrastructure, nearly 1 in 12 homes across the County were damaged with 390 completely destroyed. Buncombe County appreciates the North Carolina Finance Agency's efforts to assist affected communities through specific changes to the Qualified Allocation Plan.

SECTION II.E.3 AGENCY-DESIGNATED BASIS BOOST

The Agency can boost the eligible basis of new construction projects committing to the targeting in Section IV(B)(2) or that are located in an Opportunity Zone by up to ten percent (10%). Counties located in Tropical Storm Helene disaster areas are eligible to request up to thirty percent (30%). Projects using the DDA or QCT basis increase are not eligible under this section.

Buncombe County recommends that 4% tax credit project be permitted to request the 30% basis boost for projects located in a Tropical Storm Helene. As a HUD-Identified Most Impacted and Distressed (MID) county, incentivizing both 9% and 4% projects will be vital to recovering from the number of homes lost to the disaster.



SECTION II.E.3(c) DISASTER RECOVERY: Bonus Points (Non-DHHS Priority Counties)

Bonus Points (Non-DHHS Priority Counties) New construction applications in counties designated as a HUD-Identified or State Identified Most Impacted and Distressed (MID) area under Tropical Storm Helene will receive 1 bonus point. Additional point does not apply to counties listed under section IV(F)(5)(b).

Buncombe County remains a DHHS Priority County and should not be penalized because it is also a MID county. The priority of the DHHS to support integrated and affordable housing for people with disabilities under the Olmstead Settlement has not been eliminated by the disaster and the limited housing options for people with disabilities will only be compounded by the number of units damaged by the storm. It may appear fair to balance bonus point opportunities across counties, but the impact of Tropical Storm Helene was far from fair or balanced. Projects in Buncombe, Burke, Gaston, and Henderson Counties as well as the 28214 zip code of Mecklenburg should be eligible for the DHHS priority bonus.

SECTION II.E.3(d) Disaster Recovery Funds

Disaster Recovery Funds In the event funds are available for the 2026 cycle, any new construction application in the counties (or partial county) designated below agrees to accept CDBG-DR funds as part of a tax credit award. Eligibility for the funds will require, at a minimum, not undertaking any choice-limiting activity prior to successful completion of the U.S. Department of Housing and Urban Development (HUD) environmental clearance review as well as complying with Davis-Bacon wage requirements, Section 3 and other required federal documentation. Terms will be determined by the Agency upon fund availability.

Buncombe County does not support the substitution of tax credits with CDBG-DR funds. As a source dedicated to assisting communities with disaster recovery, CDBG-DR funds should be made available to projects in MID counties in addition to tax credit awards. This allows projects to maximize the use of both funding opportunities. Projects eligible to receive CDBG-DR should not be required to forfeit a portion of tax credits that could then be awarded outside of the MID areas. Substituting tax credits with CDBG-DR funds would also reduce the amount of CDBG-DR funds available to non-tax credit funded projects that could produce affordable units.



SECTION VI.B.5 DEFERRED DEVELOPER FEES

~~Deferment of more than twenty-five (25%) of the total developer fee will result in a deduction of 2 points.~~

Buncombe County supports the removal of negative points for deferment of more than twenty-five percent (25%) of developer fees. The change is consistent with the overall deferral cap of fifty percent (50%) and should signal applicants to leverage developer fees rather than discouraging them to cover funding gaps to avoid point reductions.

SECTION II.E.3(b) DISASTER RECOVERY: County Award Limits

If necessary, the Agency will adjust the awards under the Plan to ensure the overall allocation results in no less than one award for Buncombe County in the Metro region. The initial maximum under II(F)(1)(b) will not apply to Buncombe County should that county be eligible for a second new construction award.

Buncombe County supports the provision of no less than one award for Buncombe County in the Metro region and removal of the initial maximum. With the highest number of damaged and destroyed homes in the affected area and only the only full MID county in the Metro category, additional consideration provides an opportunity to deliver units where they are needed most in the wake of the disaster.

Thank you for your consideration.

Sincerely,

Amanda Edwards
Chair, Buncombe County Board of Commissioners

