



Buncombe County Affordable Housing Committee

Brownie Newman
Chairman

Amanda Edwards
Commissioner

Parker Sloan
Commissioner

September 26, 2022

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

Subject: 2023 Qualified Allocation Plan Comments

Ms. Hall,

Buncombe County, through its Affordable Housing Services Program, has been a local funder of Low-Income Housing Tax Credit projects for a number of years. As Chairman of the Buncombe County Board of Commissioners and a member of the Affordable Housing Committee, a Subcommittee of the Board of Commissioners which authorized the submittal of a letter of comment on the 2023 Qualified Allocation Plan, I offer the following comments and suggestions for Appendix B:

V. COMMON AREA AND SITE AMENITY PROVISIONS, F. PARKING, 1-5

Buncombe County recognizes the importance of producing quality low-income housing tax credit projects that provide common area and site amenities. Buncombe County understands the establishment of a minimum parking quantity criteria is intended to ensure residents are provided access to parking. Buncombe County's own local guidelines establish minimum parking requirements (including minimums and opportunities for minimum requirement reductions) for multifamily projects. Buncombe County has noted that waivers from QAP parking requirements are often requested for low-income housing tax credit projects within our jurisdiction. Finding adequate acreage within urban areas of the County (the City of Asheville) which offer pedestrian and transit opportunities to residents, is made more challenging with minimum parking requirements. Buncombe County has noted that developed low-income housing tax credit projects within the County, which received QAP parking requirement waivers for lesser parking, still experience underutilized parking. Buncombe County continues evaluating the effectiveness of its own minimum parking requirements. Buncombe County would suggest the QAP parking requirements be modified as indicated below.

1. Family projects require a minimum of 1.75 parking spaces per unit [where local guidelines do not establish minimum parking requirements](#).

2. Senior projects require a minimum of one parking space per unit **where local guidelines do not establish minimum parking requirements.**
- ~~3. If local guidelines mandate parking to less than the Agency requires or if the site limits parking to less than the Agency requires, the number of parking spaces required by the Agency may be reduced upon receiving Agency approval prior to the preliminary application deadline. If the local parking requirements are not known until zoning approval, the Applicant must seek Agency approval prior to the full application deadline.~~
- 4.3. There must be at least one handicap parking space for each designated Type A unit and must be the nearest available parking space to the unit. All handicap parking spaces and associated aisles must be concrete.
- 5.4. Handicap ramps may not protrude into parking lot. Handicap parking spaces and access aisles may not exceed 2% slope in any direction. Access aisles cannot be installed through vehicular paths of travel. All non-handicap parking spaces must be an asphalt or concrete solid surface with a minimum dimension of 8 feet wide and 18 feet long. Compact parking spaces may be included in addition to those required to meet Agency requirements but will not count towards the minimum required in 1 or 2 above.

III. MECHANICAL, SITE AND INSULATION PROVISIONS, E. SITEWORK AND LANDSCAPING, 10

Buncombe County recognizes the complexities of developing in areas with complex topography, due to our location in the mountains of Western North Carolina. Buncombe County's own local guidelines regulate slope development as well as engineering and design guidelines for retaining walls, though does not provide a setback specification. Developed low-income housing tax credit projects in Buncombe County regularly employ various design and engineering solutions (including retaining walls and graded slopes) to enable project completion given the topographic constraints of sites. Buncombe County understands the proposed new QAP requirement is the result of experiences where equipment access to buildings for repair/maintenance work was challenging given building setbacks from retaining walls/slopes. Buncombe County would suggest the newly proposed QAP retaining wall and graded slope setback requirement be eliminated until the impact on low-income housing tax credit developments in mountainous communities is further considered.

~~10. Retaining walls and graded slopes may not be closer than 25 feet from any building or building.~~

Thank you for your consideration.

Sincerely,



Brownie Newman,
Chairman, Buncombe County Board of Commissioners

