



BUNCOMBE COUNTY

PLANNING & DEVELOPMENT

October 13, 2023

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

Subject: 2024 Qualified Allocation Plan Comments

Dear Ms. Hall,

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. Buncombe County staff offer the following comments related to proposed changes to the 2024 Qualified Allocation Plan:

Section IV. SELECTION CRITERIA AND THRESHOLD REQUIREMENTS, F. SPECIAL CRITERIA AND TIEBREAKERS, 7. TIEBREAKER CRITERIA, (b) Second tiebreaker: The project with the highest percentage of non-Agency awarded and nonrelated party funding (excluding federal equity and bank loans) as a percentage of total replacement costs at time of full application submission., and (c) Third tiebreaker: Earliest preliminary application submittal.

Second Tiebreaker Comments: Buncombe County appreciates the acknowledgement of the importance of diverse funding scenarios for project health and feasibility in the second tiebreaker. We are concerned the second tiebreaker ultimately favors projects in urban areas where access to non-Agency and nonrelated party funding is more widely available. Projects within more rural areas are disadvantaged as they may not have access to municipal or philanthropic funding available to urban projects. We are also concerned that non-profit owners would consistently be advantaged over other owner types as they have more access to non-Agency awarded and nonrelated party funding because of their nonprofit status. These collective concerns result in our requesting the removal of the second tiebreaker language or, alternatively, placing this as a lower tiebreaker.

Third Tiebreaker Comments: Buncombe County appreciates the desire for early application submittal indicated by the third tiebreaker. We understand that the timeliness of submittals may reflect the capacity of applicants to prepare and deliver the plans necessary to manage a successful project, but we are concerned that an earlier application submittal is not necessarily correlated to a better overall project. We would request removing the third tiebreaker language or, alternatively, placing this as a lower tiebreaker.



Buncombe County offers the following comments related to language in the draft QAP Appendix B, III. MECHANICAL, SITE AND INSULATION PROVISIONS, E. SITEWORK AND LANDSCAPING, 11. Beginning 2024, retaining walls and graded slopes may not be closer than 15 feet from any building or buildings that will be determined by the Agency:

Retaining Wall and Graded Slopes Requirement Comments: Buncombe County recognizes the complexities of developing in areas with sloping topography due to our location in the mountains of Western North Carolina. Buncombe County regulates slope development and provides engineering and design guidelines for retaining walls. Buncombe County 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 in the County. We understand the new retaining wall and graded slopes requirement is the result of experiences where equipment access to buildings for repair/maintenance work was challenging. We would request the retaining wall and graded slope setback requirement be eliminated given its disproportionate impact on developments in mountainous communities.

Buncombe County offers the following comments related to existing language in the Draft QAP, V. COMMON AREA AND SITE AMENITY PROVISIONS, F. PARKING, 1-3, 1. Family projects require a minimum of 1.75 parking spaces per unit. 2. Senior projects require a minimum of one parking space per unit. 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.

Parking Requirement Comments: Buncombe County recognizes the importance of producing quality projects with common area and site amenities. We understand the establishment of a minimum parking quantity criteria is intended to ensure residents are provided access to parking. Buncombe County regulations establish minimum parking requirements (including minimums and opportunities for minimum requirement reductions) for multifamily projects. We have noted that waivers from QAP parking requirements are often requested and awarded 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. Further, we have noted that developed low-income housing tax credit projects within the County, which have received QAP parking requirement waivers for lesser parking, still experience underutilized parking. We would request the QAP parking requirements item 1 and 2 be amended to include the following additional language “where local guidelines do not establish minimum parking requirements” and that item 3 be eliminated.

Thank you for your consideration.

Sincerely,

Buncombe County Planning & Development

