

Tara Hall

From: James Royster <jroyster@mosaicdevelopmentgroup.org>
Sent: Tuesday, September 27, 2022 3:57 PM
To: RentalHelp
Cc: Kathy Stilwell
Subject: 2023 - Draft QAP Comment - 25 foot retaining wall

Good afternoon,

We will have additional QAP comments but feel compelled to go ahead and submit this comment regarding the new retaining wall language in the Appendix B.

While we agree buildings and retaining walls should have adequate space we feel the draft language is overly broad, unfair to developers who have been spent time/energy/\$ securing sites and completed design work, and particularly burdensome to hilly areas of the State and Western NC. It is also burdensome to urban infill sites where the parcels tend to be smaller and we must work with the existing grades of roads and neighboring properties. This language if left in the QAP will cause a lot of unintended consequences and make it harder to develop affordable housing in our State. The vast majority of the developers, contractors, and designers that work in the LIHTC space in North Carolina are long term partners with NCHFA. If dramatic changes are proposed to the design standards it would benefit everyone if a working group was first created from various backgrounds and various parts of the State to discuss the pros and cons and find an acceptable compromise.

Delay implementing the new proposed rule regarding retaining walls and graded slopes (Appendix B Section III.E.10). A one-year pause on this proposal would allow greater time for stakeholder input and consultation by NCHFA with engineers, architects, and other professionals to craft a more nuanced standard that addresses Agency concerns without inhibiting development of many desirable sites. We would also encourage the Agency to include an exemption for redevelopment projects since these sites are predetermined and often have constraints necessitating retaining walls.

Thank you for your consideration.

Kind Regards,

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