MINUTES
City Council Housing Committee

Tuesday, September 15, 2026 – 3:45 PM
City Hall Council Chambers

Members Present:	Pamela Holder, Chair, City Council Member Aaron Baker, Vice Chair, City Council Member Victor Foster, Citizen Member Mayor Maureen Copelof, Ex-Officio
Staff Present:	Wilson Hooper, City Manager Dean Luebbe, Assistant City Manager/Finance Director Emily Brewer, Senior Planner Shawnee Cummings, Assistant to the City Manager
Guests:	Lauren Wolf
Media:	Vivian Bikulege; Jonathan Rich

A. Welcome and Call to Order

Committee Chair Pamela Holder welcomed everyone and called the meeting to order at 3:45pm.

B. Certification of Quorum

Assistant to the City Manager Shawnee Cummings certified that a quorum was present.

C. Approval of Agenda

Mr. Foster moved, seconded by Mr. Baker to approve the agenda as presented. The motion carried unanimously.

D. Approval of Minutes – August 11, 2026 Minutes

Mr. Baker moved, seconded by Mr. Foster to approve the minutes of the August 11, 2026 meeting as presented. The motion carried unanimously.

E. Azaela Avenue Update

Mr. Hooper said there are 2 elements of this project that are being worked on simultaneously. The first is working with the County to find an engineer who can design the project using the County's $561,000 Dogwood grant. So far, they have not found an engineer who can do it within that budget, but Staff are going to meet with the County

and another potential engineer tomorrow to answer technical questions that will inform that engineer's proposal. So far, the bids have been too high and there is one that was close, but it does not account for the cost of easements. Easement costs will vary from property to property, but Mr. Hooper's working number is around $75,000-$80,000. Other bids included easements but were very expensive. Mr. Hooper said we are hoping for a bid that is affordable and includes the cost of the easements.

The second element is recovery of the $3.5 million of State funding that was repurposed. At the urging of our State Representative, Anna Ferguson, Staff are applying for replacement funding through the State Revolving Fund (SRF) program. Ms. Brewer is working on the application and it is due at the end of the month. Mr. Hooper added that it is a little more complicated than the last one, but we are going to submit it and hope that it goes through like Representative Ferguson said it will. He added that SRF is the same program we applied for years ago when we were pursuing the Azaela improvements ourselves and we were awarded funding in the form of low interest loans, which we could not afford. Mr. Hooper said we were suspicious when Representative Ferguson told us to apply through the SRF program, but ultimately it is just the vehicle we are using to get grant funding from the State. Mayor Copelof said that during Representative Ferguson's visit on Friday, they will discuss the application in depth and convey to her that the City will not be able to accept low interest loans.

Mr. Hooper said the silver lining of not getting awarded LIHTC this year is that it gives us more time to work out these challenges. He added that we intend to submit this project again when applying for LIHTC next year. Ms. Holder asked when the LIHTC application is due. Ms. Brewer said preliminary applications for LIHTC are due in January and ideally, we would find out what our plan is for the sewer extension in advance of making the decision to apply in January.

F. Woda Cooper Update

Ms. Brewer said Woda Cooper, an affordable housing developer, was conditionally awarded 4% LIHTC for the Cascade Ridge development. The project will be on Morris Rd. between the Biltmore Baptist Church and the new courthouse. A project utilizing 4% LIHTC requires a bond issued by the City as a passthrough entity, or a "conduit bond." Ms. Brewer reminded the Committee that in March, the Council approved the resolution to begin that bond process. Since being awarded LIHTC about a month ago, Woda Cooper has been updating their site plan and working with NCHFA to get their funding in order. Woda Cooper will likely get the official letter to proceed early next year and then they will work on final construction documents. Once Woda Cooper gets the full award, the City will need to engage bond counsel to help get the bonds issued and the proceeds from the bonds pay for the bond counsel's fee. Ms. Brewer said they are hoping to have their project ready by early summer, and then construction will follow for the 80+ units. Mr. Baker asked how the conduit bonds affect the City's ability to borrow in other ways. Ms. Brewer said it does not affect the City's ability to borrow and the only risk is reputational due to the City's name being associated with the bonds.

G. Update on Brevard Davidson River Presbyterian Church Property

Mr. Hooper said Council agreed to the 3-year lease extension and last week, the Church's governing body also agreed to the extension. The lease extension, which merely extends the dates and does not change the material terms, is being drafted and once complete, the City and the Church will both sign. In the meantime, DFI has reached out to Greenway and asked them to submit some initial information on their proposal that DFI will use to see if it passes the "smell test." If it passes the smell test, DFI will conduct a more in-depth, third-party review, which the City will have to pay for. The third-party review will be used to identify whether the project is feasible on that site.

During the initial "smell test," Mr. Hooper said he and Mayor Copelof are cultivating other leads in case the Greenway project does not pan out. Mayor Copelof said Alan Winchester, who organized the building of 3 houses for public school teachers in Rosman, has expressed that he would also like to bring a proposal to the City for development on the Church property. She added that Mr. Winchester found the majority of the funding for the Rosman project, so he has a record of coming through.

Mr. Hooper said he mentioned no change to the material terms of the lease because any alternative project must meet the requirements outlined in the lease, which are a minimum of 24 units, the units must be available for rent, and all of the units must be made available to people making less than 80% of AMI.

Mr. Hooper said we will likely know the results of DFI's initial assessment of Greenway in October or early November. Mr. Baker asked if the results will be presented at a Council meeting. Mr. Hooper said it will likely come to this Committee first.

H. Update on Grant for Potential Property Tax Assistance Program

Mayor Copelof said the Collaboration and Innovation Grant is offered by Dogwood Health Trust and the Housing Coalition submitted an application for $500,000. The Housing Coalition includes The Haven, Housing Assistance Corporation, the City of Brevard, Pisgah Legal Services, The Cove, and Sharing House. The Haven is the hub that submitted the grant and will be responsible for grant administration, if awarded.

Mayor Copelof said that after meeting with Dogwood, they said they received 198 applications, of which 40 moved forward to the next round. The next round included a meeting between Dogwood and a representative from each collaborative partner organization to answer detailed questions about the application. Mayor Copelof said the meeting went really well and the Dogwood representative said they would be making award decisions in October. Dogwood intends to fund about 30 of the 40 applications.

If awarded, the City's portion of the grant would be $60,000, which would fund the property tax assistance program with $30,000 for 2 years. This Committee recommended the property tax assistance program to Council for approval but it has not been taken to Council yet due to the lack of funding. Mayor Copelof explained to

Dogwood that we would be able to take it to Council within 2 weeks but have not done so to avoid raising expectations in case no funding is obtained. She added that the categories under the grant are direct services (The Haven, The Cove, Sharing House) and flexible prevention and stabilization (City of Brevard, HAC, Pisgah Legal Services, Sharing House). Mayor Copelof said she is excited that the City is a part of the application and that we developed the program enough to move it forward. Mayor Copelof said if awarded, 100% of the funding will go towards applicants who apply for the program and the City's in-kind donation is the staff time needed to run the program.

Mayor Copelof said Dogwood expressed that they are not looking for new collaborations that are forming to obtain the grant, but they are looking for existing groups that collaborate and know how to work together. The Housing Coalition was able to show significant work they have done, especially their work to help address the housing crisis after Hurricane Helene. She added that if they get the grant, the Housing Coalition could be a model for how to build a community collaborative group that can go out and obtain this type of funding. Mayor Copelof thanked The Haven for stepping up as the hub, as the City was not able to, and without their leadership, the coalition would not have been able to apply. Mr. Baker also noted that Ms. Brewer really had the program mapped out and funding organizations want to see that level of detail.

I. Manufactured Home Discussion

Ms. Brewer gave a presentation (Attachment A) on manufactured homes as a critical source of affordable housing and said it has not been looked at comprehensively since the UDO was established in 2006. It is being brought up to see if this is something the Committee is interested in exploring and to get some direction from the Committee.

Ms. Brewer explained that manufactured homes are factory-built houses constructed at a separate facility and regulated by a uniform federal construction code created specifically for manufactured homes. The code was adopted in 1976, and if you hear the term "mobile home" it refers to homes of a similar nature that pre-date the code and were built prior to 1976. She added that since 1976, manufactured homes have been held to a much more rigorous standard. On the other hand, site built and modular homes are both regulated by the North Carolina Building Code.

A rectangular "section," of which 1 section is called a single wide and 2 sections are called a double wide, is placed on top of permanent steel frame that holds the unit up. The unit is then placed on a permanent or semi-permanent foundation. Ordinance requirements often include screening panels to cover the foundation.

Ms. Brewer explained that manufactured homes are lower cost and often a more attainable housing option for low and middle-income households. It can also be an important tool in infill development for long, skinny lots.

North Carolina law allows some regulation of manufactured homes. Municipalities cannot ban manufactured homes across the entire jurisdiction, but they can either allow

it by right in certain zoning districts or the City's ordinance can have a manufactured home overlay district that allows people to have manufactured homes within that district. State law requires that it must be a defined area and cannot consist of individual or scattered lots. Ms. Brewer suggested looking at our manufactured home overlay district because it leans more towards scattered lots. Local governments can adopt appearance and dimensional criteria for manufactured homes, which is very different from houses built under the NC Building Code, where local governments are not allowed to have any architectural standards. For example, duplexes, triplexes, quadplexes, and townhomes with party walls are all built under the NC Building Code and the City cannot regulate the color, style, materials, or siding. The City's zoning regulations are limited to building height, setbacks, floodplain, and historic structure requirements. For manufactured homes, Cities can regulate building orientation, skirting requirements, roof pitch, siding, and landscaping under appearance standards.

The City's ordinance allows the continued placement of manufactured homes by right in areas where manufactured housing is a historical housing form. Manufactured homes are allowed by right in the manufactured home overlay district as individual homes and as a manufactured home park. The City requires that manufactured homes have a seal certifying that it meets HUD standards, that it be at least 8' x 32', that it have a permanent foundation without a hitch or wheels, and that it have skirting installed to cover the foundation within 30 days. As part of the Group Development Regulations adopted by the City, Staff included the manufactured home park requirements in the regulations so now it looks similar to building a cluster home development, eliminating any unnecessary burdens on a manufactured home park that you would not have for a tiny home community or cluster home development. She added that they removed the barriers that were in the regulations for manufactured home parks but did not take a comprehensive look at where they are allowed in our zoning ordinance.

Ms. Holder had questions about the City's ability to regulate modular homes and permit manufactured homes. Ms. Brewer explained that homes built under NC Building Code that meet the code cannot be regulated, but manufactured homes can be. Ms. Holder stated that manufactured homes look like a good opportunity for the dweller.

Mr. Foster said modular homes are built sturdier and to a standard where manufactured homes are not. He added that the materials are built differently, so you are basically allowing people to have a shell that looks like a home. Ms. Brewer said that is not entirely true, as manufactured homes still meet construction, safety, and energy efficiency standards, but they are regulated federally instead of at the State level. She agreed manufactured homes are built differently but are regulated to the same degree.

Ms. Holder said she is thinking about Hurricane Helene and how they would have survived with a house built that way. She asked if manufactured homes have to meet flood standards and hurricane standards, to which Ms. Brewer confirmed.

Mr. Baker noted that some of the areas in the northeastern section of the map are areas that experienced the most damage during Hurricane Helene and Tropical Storm Fred.

He asked even though the federal code regulates the building type, are people more vulnerable in a manufactured home. Ms. Brewer said that is something she will need to research, but it is her understanding that manufactured homes are built to a standard because of the rigorous process and the fact that manufactured homes in different environments all meet the same standard, including in areas prone to flooding. Manufactured homes would also still have meet the City's flood standards, so it could not be placed in a floodway and the manufactured home would have to be elevated in certain areas. Mr. Hooper said he is pretty confident that there are 2 things that mitigate their flooding. The first is that a semi-permanent or permanent foundation does not mean that they are just cinder blocks lying on the ground and it will be required to sit on a pad, go down to a certain depth, etc. The second is that the chassis is mechanically attached to the piers and not just sitting on top of them where it could be washed away with the flood waters. He added that those things give it some degree of resiliency and the first structures to be elevated after Helene were the manufactured homes on Ducks Drive because they were able to be elevated much easier than a traditional home.

Mr. Baker asked if we have data on how many manufactured homes have been added to the City within a certain time period. Ms. Brewer said we do not have great data on manufactured homes that predate the UDO and were set up outside of the overlay district, but it would be easy to see how many manufactured home parks there are.

Mr. Foster asked if we have data to show the differences between modular homes and manufactured homes and what separates them in terms of build, because there are a lot of things that are not standard in a manufactured home. He has worked on some manufactured homes before and it is a carpenter's nightmare because nothing is standardized. As for homeowners, they lose out on some of the advantages of modular homes, like being able to pick up standard materials at Lowe's. He added that modular homes are similar to, and sometimes even built better, than site-built homes, which is not the case for manufactured homes. That is where he wants to see more data.

Mr. Baker said it is not fair to judge manufactured homes based on the practices of some manufactured home parks, but there is a long history of terrible landlord practices and not meeting minimum housing standards. He knows we already regulate those things, but he thinks it should be a part of the conversation. Mr. Baker asked if there are other ways we can help protect tenants or people who are in manufactured home parks, as he knows there are issues with the park owning the land, tenants just owning the building, and landlords raising the rent substantially. Ms. Brewer said we are limited, as it gets into rent control territory and we do not have that authority. She thinks the biggest thing is to make sure we are not putting unnecessary burdens on this type of housing.

Mr. Foster said he wants to vet the idea because he wants to make sure that if they support it, they feel confident that everything is going to be okay for the homeowner.

Ms. Holder asked if tiny homes are manufactured or site built. Ms. Brewer said they can be manufactured, site-built, or modular, as North Carolina does not have a minimum home size, so any home built anywhere could be built to be tiny.

Ms. Holder said she likes the idea, as it provides opportunities to people that cannot otherwise own a home. Ms. Brewer said they also lends themselves to the ground lease model, where a homeowner may own the home itself and lease the land that it sits on, even if it is not in a traditional manufactured home park. By leasing the land, it removes a substantial part of purchase price from the equation when buying a home.

The Committee agreed to have Ms. Brewer gather more information and to further discuss the matter.

Mr. Hooper said whenever he goes to affordable housing symposiums and meetings, he gets the sense from people in the affordable housing business that a town is not really serious about affordable housing unless they entertain alternatively built housing models. Ms. Brewer added that more and more of the available grant applications are specifically around manufactured homes and rehabilitation of manufactured homes.

J. Public Comment

Lauren Wolf, who lives on E. Main St., thanked the Committee for the update on the Church property. She said she has lived here for 2 years, so she has been getting up to date and doing a lot of research to try and understand the different assessments that have been done on affordable housing. In the past few weeks, she has heard a lot of people talk about similar things to the Committee. With regard to the Church property, she said DFI's initial assessment of the Church property states that there is a possible stream to consider. She wanted to bring that up because last time she talked about her concerns related to stormwater and a stream to consider is a big deal on a federal, state, and local level. She added that many people in the neighborhood talked to her about there being springs throughout the property that stretches all the way to Broad St. There are 2 well-known springs, where groundwater is coming up and flowing, especially after rain. She believes the City knows about them, as a culvert was installed to help contain the water that comes from the spring. The company that did the geotechnical report does stream delineation assessments but did not do one for the Church property. An assessment will tell you if they are intermittent streams, and if so, there are laws about how far things must be from them. The 2 springs are right where the Church property comes from Appletree St. She brought this to the Committee because stream delineation assessments are not that expensive and it might be worth doing ahead of paying to assess Greenway. Her understanding is that sometimes these assessments fall on a developer, but they often do not do them until later. The geotechnical report mentioned that if in the process of construction, water begins pooling and it cannot be pumped out, to contact them. She added that these potential streams are where the water table is at its lowest and water flows down people's yards from Franklin St., where a lot of people have drainage pipes. In winter, you can see 2 large outfall pipes coming out from behind where the church parking lot ends. When it rains hard, she said those are heavily flowing down on the property and the property is already handling a lot of stormwater. She does not know where the water is coming from, but many people in the neighborhood are concerned about how much water the property is already managing. She emphasized that these are important considerations.

K. Next Meeting Date – Tuesday, October 13, 2026 at 3:45pm

The next meeting was scheduled for Tuesday, October 13, 2026 at 3:45pm.

L. Adjourn

There being no further business, the meeting adjourned at 4:47 pm.

Minutes Approved: November 10 ~~October 13~~, 2026

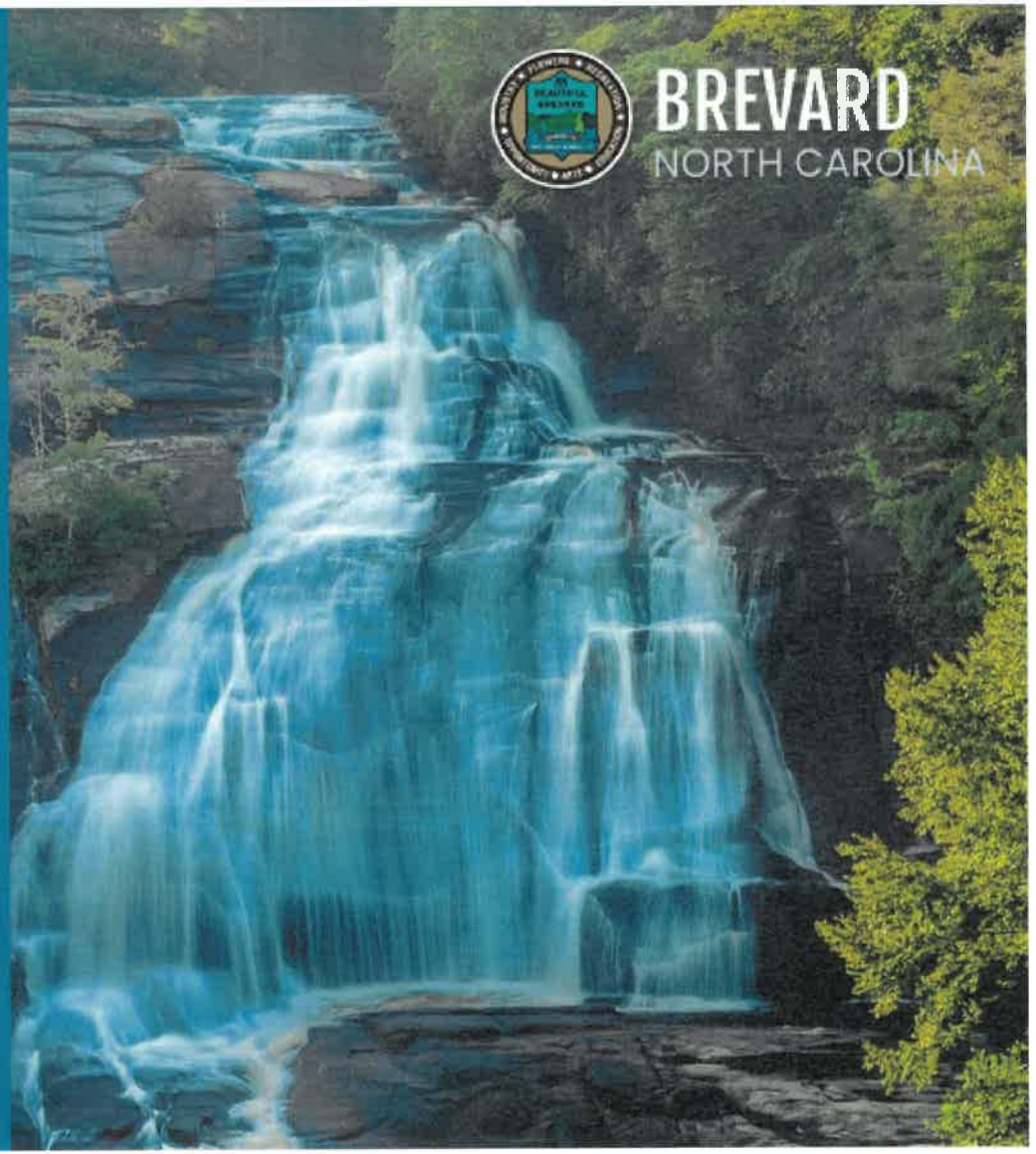
Pamela Holder, Chair, Council ~~Member~~
Aaron Baker, Vice Chair, Council Member

Shawnee Cummings
Assistant to the City Manager

Manufactured Home Discussion

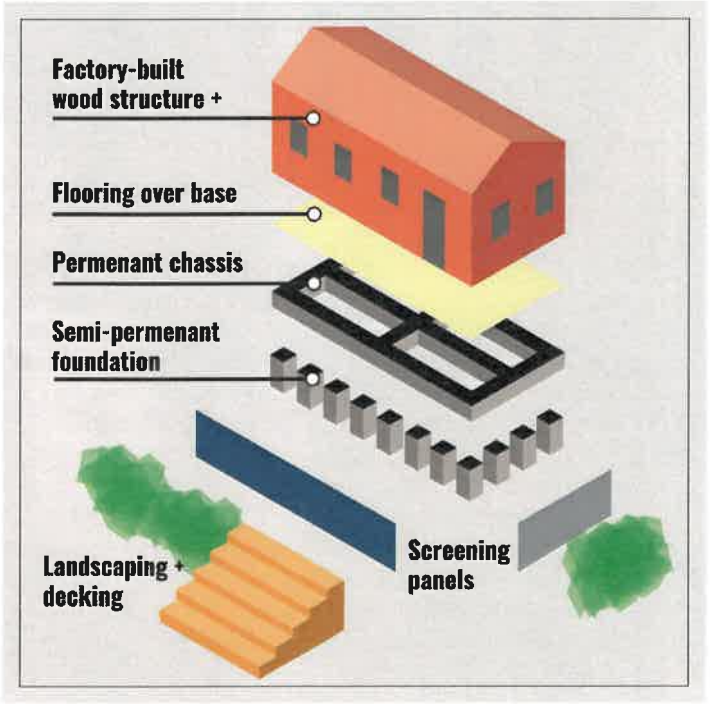
Housing Committee

September 15, 2026



What is Manufactured Housing?

- A **manufactured home** is a type of factory-built house constructed entirely in a climate-controlled facility under a strict national building code set by HUD
- Must comply with the uniform federal code, instead of following NC building code like traditional site-built homes or modular homes
- "Mobile homes" – manufactured home units built before 1976 (when new construction and safety standards were adopted)
- Key features:
  - Rectangular sections (one section is "single-wide", two sections is "double-wide")
  - Permanent chassis – non-removable steel frame



Source: New Hampshire Housing Toolbox

Manufactured Housing & Affordability

- A lower-cost path to homeownership
- Smaller and more attainable housing options
- An alternative to traditional site-built construction
- Housing opportunities for lower- and moderate-income households
- Potential opportunities for infill and underutilized residential land

Should we reconsider how manufactured housing can be used in Brevard as a component of the broader affordable housing strategy?

What does NC law allow us to regulate?

NCGS 160D-910

- A local government **cannot ban manufactured homes** across an entire jurisdiction or reject them based on age
- A local government can adopt "**appearance and dimensional criteria"** for manufactured homes
  - *Different than structures built under NC Residential Building Code (single-family to quadplex)!*
  - Purpose must be to protect property values, to preserve the character and integrity of the community or individual neighborhoods, and to promote the health, safety, and welfare of residents.
- A local government can designate a **manufactured home overlay district**
  - Cannot be an individual lot or scattered lots but **must be a defined area**

Appearance Standards

- **Structures under NC Residential Code**
  - Single family, duplex, triplex, quadplex, townhomes with partiwalls
  - NO aesthetic or architectural standards allowed (building color, style, materials, etc.)
  - Limited to building height, setbacks, floodplain regulations, and historic structure requirements
- **Manufactured Homes**
  - Not regulated by the NC Building Code and CAN have "appearance and dimensional standards"
  - Examples: placement on an individual lot vs. a manufactured home park, building orientation, skirting requirements, roof pitch, siding, landscaping



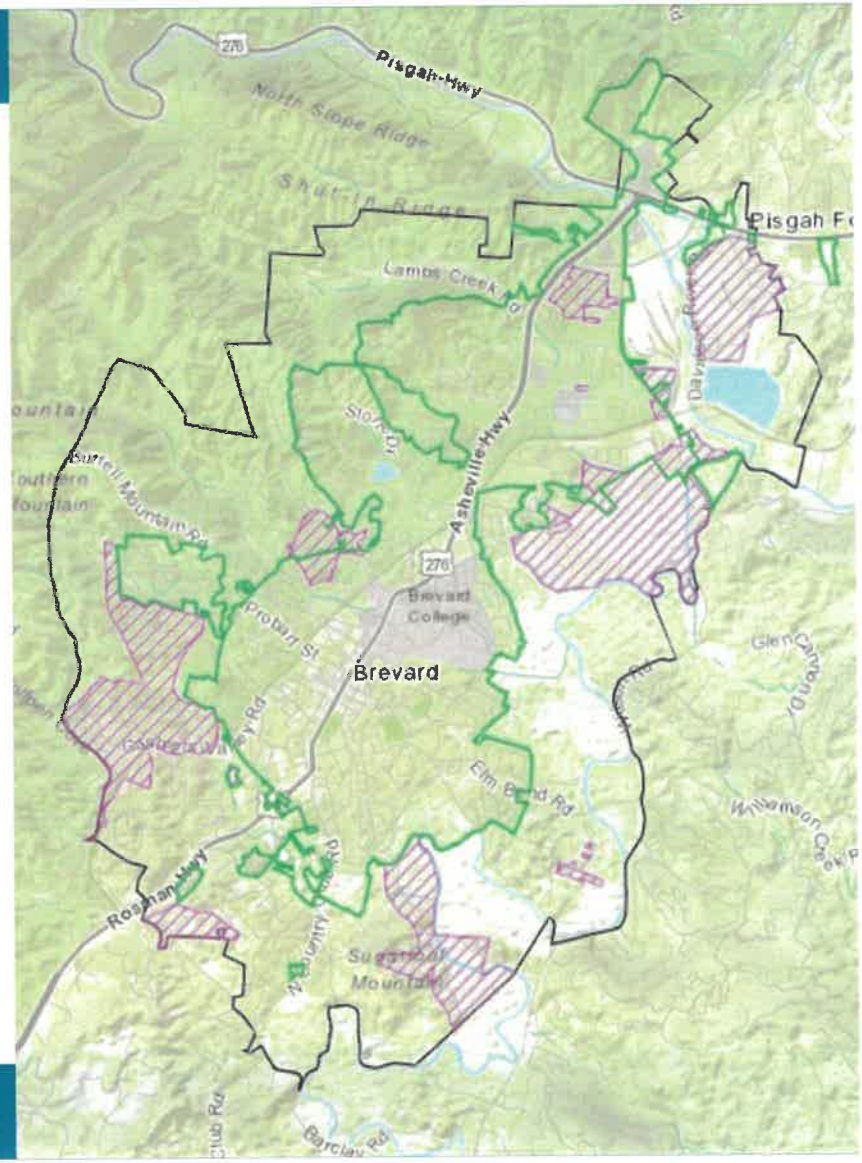
Shipping container accessory dwelling unit in Wilmington
(~$135,000 cost for 320 square feet)



Manufactured home for sale in Asheville
($139,900 listing price for 1,056 square feet)

What is in our ordinance?

- Manufactured Home Overlay District (MHD)
  - *"The purpose of the MHD is to allow for the continued placement of manufactured homes by right in areas where manufactured housing is a historical housing form."*
  - Adopted as part of the UDO in 2006
  - Allowed by right in individual homes or manufactured home park
- Manufactured homes must:
  - Have a seal certifying it meets HUD standards
  - Be at least 8 feet by 32 feet
  - Be on a permanent foundation
  - Not have a permanent hitch or wheels
  - Skirting required within 30 days of setup
  - Residential use only
- Group development standards now include manufactured home parks



Key Questions

- Should manufactured homes be treated as a legitimate form of single-family housing rather than as a separate housing category?
- Should manufactured homes generally be allowed wherever detached single-family homes are allowed?
- Should we have a manufactured home overlay district or allow them by-right?
- Where should manufactured home parks be allowed? Is it different?
- Should manufactured homes have the same dimensional standards as other single-family homes?
- Which appearance standards are actually necessary?
- Are any existing requirements unnecessarily increasing the cost of manufactured housing?

Direction from the Committee

Manufactured housing can be an important component of Brevard's affordable housing strategy. ***Is this something you want us to explore further?***

What, if anything, should we look at?

- Expand locations where manufacture homes are permitted (maybe by-right instead of with the overlay district?)
- Appearance standards (similar to a single-family house or different?)