



**LOWCOUNTRY HOUSING &  
ECONOMIC DEVELOPMENT  
FOUNDATION**

October 28, 2019

South Carolina State Housing and Development Authority  
Attn: Mr. Chris McMillian  
Acting Tax Credit & Bond Manager  
And  
Ms. Sara Martinez  
Director of Development  
300 C Outlet Pointe Blvd.  
Columbia, SC 29210

Subject: Draft QAP 2020 (Section 5, F)

Dear Mr. McMillian and Ms. Martinez:

I am writing to address to express my objection to the specific language contained in the Draft QAP Section 5 embolden below and in support of the position taken by the Housing Authority of the City of Charleston.

**F. Required Development Experience**

**In order to participate in the LIHTC program, the proposed owner's general partner(s) or managing member(s) must have experience within the last 10 years in**

- **two (2) LIHTC projects in South Carolina or**
- **four (4) LIHTC projects in other states.**

**Each project must have received its 8609s, placed in service, and reached stabilized occupancy. The G=general partner or managing member must have held a controlling stake from initial application through certificate of occupancy or a minority stake of at least 25% as a Junior Developer, as reflected on Exhibit K and related documentation.**

**The Authority may use other criteria as necessary to evaluate whether the Development Team has sufficient experience and capacity to successfully develop the project.**

I have been associated with the South Carolina public and affordable housing sphere since the inception of the Section 8 program in Charleston in or around 1978. I have served as a property manager, owner, broker manager of FHA properties and developer of two 9% LIHTC properties; Lincolnville Apartments Limited Partnership and Mayflower Limited Partnership. I am a retired Executive Director of the Charleston County Housing and Redevelopment Authority.

I find the embolden language to be egregious, cost burdensome and without regard to the expertise existing in the field.

If there is an agency in South Carolina, with the necessary experience to develop and operate properties in either the LIHTC sphere or through the regular real estate market, I place my confidence in the Housing Authority of the City of Charleston (CHA), under the leadership of its current CEO, Donald J. Cameron. I know that in the past 30 plus years the CHA has produced a thousand or more non subsidized housing units. I also know, for years the QAP eliminated Charleston County for consideration of LIHTC subsidy because of an emphasis on rural areas of South Carolina.

I think all of this must be factored in the ill-defined and subjective process stated as: **The Authority may use other criteria as necessary to evaluate whether the Development Team has sufficient experience and capacity to successfully develop the project.**

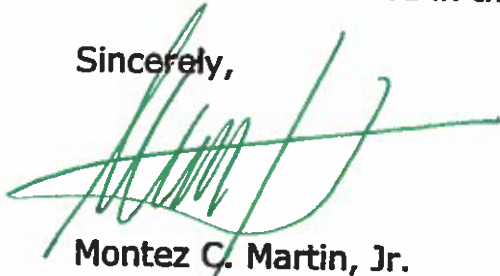
All of that said, my ask is a very simple one which only affects one segment of the applicant pool but a very important and vital segment. I suggest the addition of a third bullet point to paragraph "F", which might read something like: **Public Housing Authorities involved in the HUD Rental Assistance Program (RAD).**

Hopefully, I will be able to attend the public comment session, Monday, November 4 at 10am.



The intent of this letter is to be instructive and helpful. I am hopeful my remarks are received in that manner.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Montez C. Martin, Jr.', written over a horizontal line.

Montez C. Martin, Jr.  
CEO

