

From: Bernie Mazyck [REDACTED]
Sent: Monday, November 4, 2019 4:25 PM
To: McMillan, Chris 6-9196
Cc: Shropshire, Bonita 6-9005
Subject: Comment on draft QAP Section 5.F
Attachments: QAP Comment on Section 5.F.pdf

Good Afternoon McMillan,
I hope all is well with you. I am submitting a comment on the draft QAP, specifically Section 5.F on behalf of nonprofit housing developments and public housing authorities. Attached, please find our comment letter. After reviewing, feel free to give me a call if you have any questions. Thank you for your service to the residents of South Carolina.

All the best,



Bernie Mazyck, MDiv
President & CEO

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November 4, 2019

South Carolina State Housing Finance and Development Authority
Attn: Mr. Chris McMillan
Acting Tax Credit & Bond Manager
300C Outlet Pointe Blvd.
Columbia, SC 29210

Subject: Draft QAP 2020 (Section 5.F)

Dear Mr. McMillan:

I hope this letter finds you well. I am writing to register a concern about Section 5.F of the draft QAP 2020. On behalf of the nonprofit housing developers of South Carolina and the public housing authorities, the SC Association for Community Economic Development (SCACED) is appealing to SC Housing to make sure that as many qualified developers have access to the Low-Income Housing Tax Credits.

SCACED is the state-wide trade association and funding intermediary for over 100 nonprofit community development corporations (CDCs), community development financial institutions (CDFIs), banks, foundations and governmental entities seeking to improve the quality of life for low-wealth families and communities. A critical part of improving the quality of life for low-wealth families is the provision of affordable housing in their communities. We are encouraged by SC Housing's efforts to reduce the experience requirements for LIHTC from 7 tax credit deals in 8 years to 2 LIHTC projects in South Carolina or 4 LIHTC projects in other states. This change is headed in the right direction. But in conversations with the public housing authorities who are members of SCACED, this requirement could eliminate them and other qualified nonprofit developers from accessing a vital federal resource to producing affordable housing in South Carolina. This includes high volume producers of affordable housing who have the capacity to compete for LIHTC allocations. We are asking you to consider other criteria, to include their experience in producing affordable housing units in under-resourced communities.

With the demand for affordable housing ever increasing in South Carolina, nonprofit housing producers and public housing authorities are a vital partner to reducing the tremendous need for affordable housing in South Carolina. If you have any questions, please don't hesitate to contact. Thank you for your service to South Carolina.

All the best,


Bernie Mazyck
President & CEO