

## 2020 Tax Credit Program

# Bulletin #4

February 28, 2020

### Questions and Answers

1. **Question:** External storage – Section L-5 : Exterior Storage Closet attached to each individual unit (interior common area only for congregate) – where can the “external storage” exist, are we able to have it as part of the unit, or must it exist outside of the unit (in a corridor or located somewhere else in the building away from the units)

**Answer:** There must be an exterior closet provided for each unit, placement is up to the discretion of the developer and architect as long as the said placement flows with the development and is code compliant. Section II, L, 5 is updated as follows; “Newly constructed residential units must have an exterior storage closet provided for each individual unit (interior common area only for congregate) with...”

2. **Question:** Sunrooms – how separate does a sunroom need to be from a living area, is a half wall enough to be a separation?

**Answer:** A sunroom has to have distinct architectural separation from the living room which can be accomplished by a half wall/ knee wall, cased opening, butt-out of the adjacent wall etc. It is not required to be separated by doors.

3. **Question:** Can the dining area be part of the Sunroom?

**Answer:** No other room or area can be part of the sunroom.

4. **Question:** What is the architectural drawing submittal process for QAP?

**Answer:** Must submit one full size (24” x 36”) hard copy and one electronic (PDF) on a thumb drive.

5. **Question:** Can we schedule a preliminary design meeting to review for compliance?

**Answer:** No.

6. **Question:** Is a clubhouse required for a neighborhood of townhomes, mixed rental and for sale?

**Answer:** A community room must be provided regardless of construction types.

7. **Question:** We are evaluating the development of an apartment community utilizing townhome style units. The development of an apartment community with townhome style units appears to be distinct from building the townhome or single family development referenced in paragraph II. S of the QAP, which requires townhomes to have 2 or more bedrooms and which would/could ultimately be sold following the initial 15 year compliance period. The reason we’re asking for the clarification is because we’d very much like to include 1 br floor plans. The primary market area in which the development would be located is nearly devoid of 1br tax credit units. Will you confirm that the Authority permits 1 bedroom townhome-style apartments?

**Answer:** Yes the Authority will allow one bedroom townhouse style apartments as part of the development’s unit bedroom types. (The Authority will not allow developments consisting only of 1 bedroom units.)

**Clarification:** For the purpose of the QAP the definition of a “Townhouse” in section (II, S) is; “A single family dwelling unit constructed in a row of three or four attached units two or three stories tall in which each unit extends from foundation to roof with a yard or public way in the front and back. Each unit would be on a separate lot (property line between units) with its own separate street address. These units would be considered IRC R-3 buildings.” Section II, S, 3, c has been updated to reflect this.

A “development” with townhouse style apartments constructed in a row or congregate of five or more units with a single building address with unit designations that would be considered IBC R-2 buildings are not classified as “Townhouse’s” for purposes of the QAP Section II, S.

8. **Question:** Does the 32”x60” tub/shower mean nominal or interior clear dimensions or overall? There are very limited manufacturers that offer the 32”x60” nominal or interior clear dimension tubs.

**Answer:** 32” x 60” is the call size or net size of the tub/shower.

9. **Question: Public use stairways to be galvanized steel.** This is very expensive and not necessary in protected interior stairwells. Please clarify as to whether this applies to exterior stairwells only.

**Answer:** This section applies to exterior stair wells only. Note the section’s header of “Exterior Stair, Railings, Columns & Signage. Interior stairs in heated and cooled areas are to be deigned to meet all applicable codes and requirements.

10. **Question:** Please provide clarification on the window and door warranty requirements.

**Answer: Section II, I Windows and Doors is updated as follows;**

#### **I. WINDOWS AND DOORS**

All windows and exterior doors must be Energy Star rated for zone south central, be of high quality, durability and must be installed per manufacturer’s requirements to achieve at least a 10 year warranty for windows and 1 year warranty for Fire Rated doors. Developments are required to provide the Authority a written manufacturer warranty. This can be submitted with the placed in service application.

11. **Question:** Metal clad steel edge doors and frames are acceptable for use in firewalls only. Does this mean we are not allowed to use metal edged doors and frames in non-rated walls?

**Answer:** Correct, metal clad steel edge doors and frames are only acceptable for use in firewalls.

12. **Question:** Windows should not have J mold for brick and correct J mold for siding applications. Is a window that has an integrated J design for use in both brick and siding applications acceptable?

**Answer:** Yes integrated J-Channel designed for use in brick and siding applications is acceptable as long as the J-Channel width is of the correct size for receiving the applied siding veneer.

13. **Question:** Counter tops may be manufactured post form, granite or solid surface. Please clarify as to whether post form laminate tops are acceptable.

**Answer:** Post form laminate tops are acceptable.

14. **Question:** Refrigerator, range and kitchen sink must be ADA certified. Appliance and plumbing representatives we have talked to on ADA appliances/sinks have all indicated these items are not ADA certified but rather designed to be compliant with ADA. We are not aware of any ADA certification process for fixtures. Please clarify that these items can be ADA compliant rather than certified.

**Answer:** Correct these products were incorrectly listed as “compliant” instead of “certified”. These sections have been clarified.

15. **Question:** Under the unit requirements, page B-5, the units are required to have a “laundry room”. Does this need to be an actual room? Or is a laundry closet (min 36” deep) acceptable?

**Answer:** A laundry closet is permissible if 36” deep measured from the back of the door.

16. **Question:** With regard to the brick veneer requirements, in meeting the percentage requirements is it required to have brick veneer at 100% of the perimeter of the building or can we have areas where siding extends to the building slab without brick, as long as we meet the percentage requirement?

**Answer:** In regards to the brick or stone veneers of a building, you also have to apply the requirements in Section II, E, 5, 6 and Section II, F, 1. Developments cannot have areas that the siding extends to the building slab and brick or stone veneer is required on all exterior wall faces.

17. **Question:** Is SC Housing going to review the washer and dryer requirements specifically for rehabilitation projects.

**Answer:** Section II, C, 4, c has been updated as follows:

a. The number of commercial grade washers and dryers required per development is based upon the total units in the development as follows:

0-15 units	2 Washers and Dryers
15-30 units	3 Washers and Dryers
30- 60 units	6 Washers and Dryers
61-100 units	8 Washers and Dryers
101-150 units	10 Washers and Dryers
151-250 units	12 Washers and Dryers
250+ units	15 Washers and Dryers

18. **Question:** Rehabilitation project: Section II, B, 5, c, is this a requirement in an existing site with no existing roll in showers and required for all Type A units?

**Answer:** Yes this requirement applies to both new construction and rehabilitation projects.

19. **Question:** Rehabilitation project: Section II, B, 5, d, some existing apartment communities do not have the half bath on the first floor and cannot be reasonably added. How is this to be addressed?

**Answer:** This section does not apply to rehabilitation projects unless it’s a gut rehab including plumbing.

20. **Question:** Rehabilitation project: Section II, B, 8, Breezeways: 48” minimum path of travel is required through building breezeways. Most breezeways are less than 48” and once the site is built, there is no control to change. How is this to be addressed?

**Answer:** This section does not apply to rehabilitation projects although all current egress and accessibility codes and regulations must be met.

21. **Question:** Rehabilitation project: Section II, B, 9, Moisture resistant gypsum board must be installed on all ceilings and walls of bathrooms, on all walls of laundry rooms, mechanical closets and exterior storage closets, and behind kitchen sink base and dishwasher.

The ceilings, laundry rooms, mechanical closets and exterior storage closets are not built with moisture resistant drywall; it would not be prudent to change.

**Answer:** This section does not apply to rehabilitation projects unless there is a proposal to replace that area of gypsum board.

22. **Question:** Rehabilitation project: Section II, B 10, Water-resistant gypsum board or equivalent shall be provided behind any tub/shower unit located on an exterior wall.

Some exterior walls were not built with drywall behind the tubs. It is not typical to install unless the building inspector has required. In all cases, on a party wall, the drywall is installed. During the initial inspection phase, the wall behind the tub would have to be cut out to confirm and priced accordingly. In most cases, the drywall behind the tubs cannot be identified as moisture resistant without removal of the drywall around the tub with enough removal to see behind the tub.

**Answer:** This section does not apply to rehabilitation projects unless there is a proposal to replace that area of gypsum board.

23. **Question:** Rehabilitation project: Section II, C, 7, b, I, There must be at least one handicap parking space for each designated accessible unit that must be the nearest available parking space to the unit and all handicap parking spaces and associated aisles must be concrete. Is this required for rehabilitation projects also?

**Answer:** Only if you are adding, replacing or reworking the parking surfaces or spaces.

24. **Question:** Rehabilitation project: Section II, H, 5, Framing of roof and ceiling systems to allow the full depth of ceiling insulation to extend over the top plate of the exterior wall. Is this required on an existing building?

**Answer:** Does not apply to rehabilitation projects.

25. **Question:** Rehabilitation project: Section II, H, 6, Exterior walls R-13 insulation. Is this wall insulation upgrade required on existing buildings?

**Answer:** Does not apply to rehabilitation project unless the scope requires opening of the wall.

26. **Question:** Rehabilitation project: Section II, H, 9, Unit party walls and floor assemblies require sound proofing (sound batt insulation) to achieve a rating of STC 54. How is this to be accomplished on existing buildings?

**Answer:** This may be accomplished by adding an STC prescriptive to the wall or ceiling assembly.

27. **Question:** Rehabilitation projects: Section II, I, 1, Door sizes for rehabs? Are solid wood doors required? Exterior doors 3-0 in width?

**Answer:** Section II, I, 1, 2 has been updated for clarity as follows;

1. All interior doors must:

- a. Be side hinged
- b. Be hollow core paneled hardboard, paneled solid wood or hollow core flush hardwood doors.
- c. Bedroom doors must be 3-0. Does not apply to rehabilitation projects.
- d. Bath doors minimum of 2-8. Does not apply to rehabilitation projects.
- e. Closet doors minimum of 2-6. Does not apply to rehabilitation projects.
- f. Pantry doors minimum 2-0. Does not apply to rehabilitation projects.

- g. Hollow core, flush lauan doors are prohibited.
- h. ADA accessible doors at common areas and Type A units must:
  - i. Have ADA lever hardware.
  - ii. Be 3-0 minimum.
  - i. Have a 3/4" minimum air space at bottom of door measured from finished floor for air circulation.
  - j. Louvered doors at HVAC closet for air handler return are acceptable.
- 2. All exterior doors must be Energy Star metal-clad or fiberglass doors and must:
  - a. Metal clad steel edge doors and frames are acceptable for use in firewalls only.
  - b. Provided door manufacturers data sheet (s) with plans.
  - c. Be side hinged.
  - d. Be a minimum of 3-0 in width (34" clear width). For rehabilitation projects 2-10 width doors shall be permitted and shall provide a clear width of not less than 32 inches where measured between the face of the door and the stop, with the door open 90 degrees if door is located in a masonry wall prohibiting increasing the door width.

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28. **Question:** Rehabilitation project: Section II, I 3, d, Be single hung, double hung, casement or awning. Sliding windows are prohibited. . In a rehab property, can this requirement be waived and sliding windows be allowed to replace existing sliding windows where it is impractical to change?

**Answer:** No, waivers are not accepted.

29. **Question:** Rehabilitation project: Section II, J, 3, All units must have an 18 cubic foot minimum Energy Star rated frost free refrigerator freezer with ice maker. Can this be waived for rehabs?

**Answer:** Section II, J, 3 has been updated as follows: All units must have an 18 cubic foot minimum Energy Star rated frost free refrigerator freezer with ice maker; rehabilitation projects must provide a 14 cubic foot minimum Energy Star rated frost free refrigerator. Ice maker not required in rehabilitation projects if cost prohibitive base on plumbing.

30. **Question:** Rehabilitation project: Section II, J, 3, a, Doors must open beyond 90 degrees to allow bin removal. Can this be waived on rehabs?

**Answer:** No.

31. **Question:** Rehabilitation project: Section II, K, 2, Vanities cabinets shall be provided in all units and must be 36" minimum. Is this required in rehabilitation projects?

**Answer:** Section II, K, 2 has been updated as follows: Vanities/cabinets shall be provided in all units and must be 36" minimum. Vanities/cabinets for rehabilitation projects shall be 24" minimum.

32. **Question:** Rehabilitation project: Section II, K, 7, Water closets must be centered, at a minimum, 18 inches from sidewalls, vanity/lavatories and bath tubs and be clearly marked on the plans. Can this be waived on rehabs (except UFAS units)?

**Answer:** Section II, K, 7 has been updated as follows: Water closets must be centered, at a minimum, 18 inches from sidewalls, vanity/lavatories and bath tubs and be clearly marked on the plans. Does not apply to rehabilitation projects unless UFAS unit or a gut rehab including plumbing; however it must meet current code requirements.

33. **Question:** Rehabilitation project: Section II, K, 8, a, must contain a roll in shower and is this required in rehabilitation even if walls have to be moved?  
**Answer:** Yes.
34. **Question:** Rehabilitation project: Section II, L, 5, c, storage closets may not have any dimension smaller than 36 inches in width or depth. Are rehabilitation projects required to provide this?  
**Answer:** Section II, L, 5, c has been updated as follows: Storage closets may not have any dimension smaller than 36 inches in width or depth. Does not apply to rehabilitation projects.
35. **Question:** Rehabilitation project: Section II, M, 1, a, Must have a minimum depth of 36” measured from the back of the door. Where needed can we remove doors to accommodate the W/D?  
**Answer:** No.
36. **Question:** Rehabilitation project: Section II, M, 5, a, each clothes washer and dryer must be centered for a side approach only. Does this apply to rehabilitation projects?  
**Answer:** Section II, M, 5, a has been updated as follows: Each clothes washer and dryer must be centered for a side approach only. Rehabilitation projects can utilize front or side approach.
37. **Question:** Rehabilitation project: Section II, O, 4, Bottom of returns must be 12” minimum above FFE. Depending on the closet size, can this item be waived?  
**Answer:** No.
38. **Question:** Rehabilitation project: Section II, O, 14, a, Venting through the roof is prohibited. If existing does it have to be re-run? Does this requirement apply to rehabs without roof replacement?  
**Answer:** This provision applies regardless of roof replacement and any existing venting through roof must be addressed.
39. **Question:** Rehabilitation project: Section II, P, 11, Toilets must be centered, at a minimum, 18 inches from sidewalls, vanity/lavatories and bath tubs and be clearly marked on the plans. Can this be waived on rehabs (except UFAS units)?  
**Answer:** Section II, P, 11 has been updated as follows: Toilets must be centered, at a minimum, 18 inches from sidewalls, vanity/lavatories and bath tubs and be clearly marked on the plans. Does not apply to rehabilitation projects unless UFAS unit or a gut rehab including plumbing; however it must meet current code requirements.
40. **Question:** Rehabilitation project: Section II, P, 12, c, 40 gallon for one and two bedroom units. Can we request a waiver for this requirement or utilize a booster on a 30 gallon water heater for rehabs?  
**Answer:** No.
41. **Question:** Rehabilitation project: Section II, P, 12, I, Elevated if necessary for proper pan drainage. Please confirm this requirement is for new construction only.  
**Answer:** This requirement applies to all projects, including rehabilitations.

42. **Question:** Rehabilitation project: Section II, P, 13, All hub drains serving HVAC condensate lines and water heater lines must be piped to the outside. Piping to the sanitary sewer is not allowed unless a primed p-trap is installed. Please confirm this requirement is for new construction only.  
**Answer:** This requirement applies to all projects, including rehabilitations.
43. **Question:** Rehabilitation project: Section II, P, 15, All single family, Townhouse, Duplex and single story development must supply a frost-proof faucet at the front and rear of each unit on the unit's water supply. In existing buildings, exterior walls were not built to allow 9" frost proof faucet. Please confirm for new construction only.  
**Answer:** This requirement applies to all projects, including rehabilitations.
44. **Question:** Rehabilitation project: Section II, Q, 9, Overhead lighting is required in all bedrooms, bathrooms, laundry rooms, closets, and storage rooms and to be wall switched. Rehabs-Some laundry rooms do not have ceiling lights and storage rooms have pull chain lights not switched at the wall. Most bathrooms do not have both a ceiling light and one located over the vanity. On rehabs this would not be cost effective. Can there be some flexibility where impractical?  
**Answer:** This requirement applies to all projects, including rehabilitations.
45. **Question:** TC Bulletin #2 Question 14: The bulletin stated that "Item 2(e) regarding the playground is still required." Please confirm that a playground complying with the requirements of the mandatory design criteria Section C Item 2(e) is required for a family rehabilitation project ONLY if the scope of work includes work on any existing playground equipment.  
**Answer:** This is correct only if the playground is included in the scope of work for the rehabilitation.
46. **Question:** Rehabilitation project: Does SC Housing require red lined plans for rehabilitation projects.  
**Answer:** Section I, B, 5, e has been updated as follows: Plans are to be redlined for projects involving renovation and/or demolition of existing structures, proposed changes to building components and design and also describe removal and new construction methods."
47. **Question:** What are the current adopted codes for South Carolina?  
**Answer:** The applicant is responsible for knowing the current codes in South Carolina. Section I, A, has been clarified as follows: Construction must be in compliance with:
1. 2018 International Residential Code with South Carolina Building Code Council Modifications.
  2. 2018 International Building Code with South Carolina Building Code Council Modifications.
  3. 2018 International Mechanical Code with South Carolina Building Code Council Modifications.
  4. 2018 International Plumbing Code with South Carolina Building Code Council Modifications.
  5. 2018 International Fuel Gas Code with South Carolina Building Code Council Modifications.
  6. 2017 International Electrical Code with South Carolina Building Code Council Modifications.
  7. 2018 International Fire Code with South Carolina Building Code Council Modifications.
  8. 2009 International Energy Conservation Code with South Carolina Building Code Council Modifications
  9. Current Adopted Edition of the NFPA Codes and Standards.
  10. ANSI 17.1 – 2017 Edition.
  11. Americans with Disability Act.
  12. Fair housing Act.
  13. Section 504
  14. HD Housing Quality Standards (HQS).
  15. HUD Minimum Property Standards (MPS).
  16. HD Uniform Physical Condition Standards (UPCS).

These code standards are not meant to replace Federal, State or local codes.

Additionally, Section II, A, regarding Older Persons 55+ Developments, item #3, has been clarified to read: Accessible and Adaptable: 100% of the units must be accessible and adaptable (Type B), as defined by the Fair Housing Amendments Act of 1988. For rehabilitation projects refer to the Fair Housing Amendment Act of March 13, 1991.

Additionally, Section P, item 16 regarding Safe Drinking Water has been added as follows: Safe Drinking Water – the architect must certify on the final plans and/or specifications that the project will be constructed using lead-free pipes, solder, and flux. Applications proposing the rehabilitation of structures built 1988 or earlier must have the pipes, solder, and flux tested for lead and include a copy of the report with the Application. Items testing positive for lead must be included in the PNA for replacement.

48. **Question:** Does the 30% brick requirement apply to single family homes, townhomes or duplexes?

**Answer:** No. This section does not apply to single family homes, townhomes or duplexes.

49. **Question:** Does the primary and secondary bedroom sizes in Section L apply to rehabilitation projects?

**Answer:** No. These sections do not apply to rehabilitation projects.

50. **Question:** What are the interior noise requirements allowable in the 2020 QAP?

**Answer:** All projects must have an interior noise level of no more than 45 decibels (db) in prescriptive with the outside noise level. Plans must identify the STC ratings to achieve HUD's acceptable interior level of 45 decibels. Sites with Exterior noise levels of 75 decibels or higher are not eligible for funding. Please refer to Bulletin #3 for further guidance.

**As a matter of convenience, attached to this bulletin is a revised Appendix B Development Design Criteria incorporating clarifications/changes in this bulletin and Bulletin #2. Such clarifications/changes are in red for your convenience.**



