

From: [Jay Bernstein](#)
To: [TaxCreditQuestions](#)
Subject: 2021 QAP Comments
Date: Friday, November 6, 2020 9:19:00 AM

As a whole, I really like the changes to the 2021 QAP; however, there are a few areas that I feel need further consideration.

1. Section V K (2)(e) states that any development located within 50 feet of a FEMA 100 or 500 year flood zone or a wetland defined under the clean water act will be disqualified. This requirement would eliminate a large portion of coastal areas including major metropolitan centers such as Charleston and Myrtle Beach. In Charleston, the entire downtown peninsula (one of, if not the the most densely populated area in the state) would be eliminated from participating in the 9% program. These municipalities have ordinances in place to deal with the low lying nature of the terrain. I would urge SC Housing staff to review the new FEMA flood maps to get a better understanding of how limiting this provision would be for development in coastal areas.

2. Section VI (H) - Revitalization or Local Policies. This section appears to be too vague and open to interpretation. I would recommend simplifying this section. One possible solution would be to allow for a simple letter from the municipality stating the site is part of a revitalization area or there are local policies calling for affordable housing in the area.

Thanks,

Jay Bernstein



[\[Redacted\]](#)