

From: [Travis Ismir](#)
To: [TaxCreditQuestions](#)
Subject: [External] 2022 SC QAP Tax Credit Questions
Date: Friday, October 15, 2021 11:40:13 AM

- Please pay special attention to clarifying which provisions apply to 9% applications and/or 4% applications. For example, the section on award limitations generally doesn't specify if the limitations apply to 9%, 4% or both.
- Please re-examine the tax credit and bond application checklists to ensure that all required or desired items are included. For example, the QAP requires that management companies have one of several certifications, but neither the QAP nor the checklist require submittal at application, however, this was requested during review of our 9% applications. If possible, it would be great to have additional documents required by specific forms included on the checklist as well (application certification, Exhibit W items, and Exhibit BB items, for example)
- Please consolidate the tax credit and bond application checklists or clarify when to use each. We received conflicting information on which one to use for submittal of a LIHTC-only application with locally-issued bonds, and there is no clear guidance as to which checklist to use for a LIHTC and bond cap application to SC Housing
- Please carefully consider the items requested at application, the value each brings to the review of the application, and whether or not each item should be provided at the time currently required. For example, a survey is required at application, but a Phase I is not. Minor deviations in boundaries or grade can be accommodated after award, but discovery of an environmental may not be. We applaud SC Housing's effort to minimize the burden of required application items, but it seems that these two items may be out of order. Similarly, full landscape and lighting plans, the construction cost addendum, and (to the extent this requirement isn't being removed from the bond checklist) site signs and flags may not add much value to the application. Design requirements can be certified without engineering a lighting plan, construction costs will be certified at completion, and GPS and parcel maps can accurately depict the site location.
- Please consider allowing swimming pools as amenities.
- Please consider removing or greatly scaling back the construction cost addendum. It is extremely difficult, if even possible, at application to provide accurate takeoffs and pricing, and pricing is surely subject to change between application and construction anyway.
- Please consider removing or revising item c under permanent financing. There can easily be situations where cash flow or related party loans benefit a project and may be unrelated to the developer fee, and allowing both will provide more sources of funds to projects and help limit the tax credit request. For example, if a local municipality makes a soft loan to a project to incentivize affordable housing and the developer is willing to defer fee to make the deal work, why would the state want to limit this?
- Please clarify scoring section G Leveraging. Item 2(b) was revised to eliminate eligibility for loans, but item 3 states that 2(b) must be shown on the application as a loan.
- Please clarify Appendix D as to whether all eligible LIHTC applications MUST request a

\$500,000 HOME loan, or if applicants have the option whether or not to request, but that all requests must be in the amount of \$500,000.

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