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**From:** Drew Schaumber [REDACTED]  
**Sent:** Thursday, June 10, 2021 10:48 PM  
**To:** TaxCreditQuestions  
**Subject:** QAP Comments

Comments for the 2022 QAP:

Missing Items - there should be some point loss for missing items especially if it is a big item that's missing. What is to keep someone from submitting an application without a zoning letter or utility letter and then getting that letter after the fact but have the letter pre-dated? Missing a single document may not be a point deduction, but there should be a threshold where an incomplete application gets deducted points.

Incomplete Items - there should be some point loss for incomplete or incorrect items if there are more than x number of items.

Very High Census tracts have the most expensive land and if something is available for purchase and development, it may not be that attractive from a real estate perspective even if it's in a very high census tract. Opening up High and Very High at the same point score would give developers more areas to look for sites and still push developments into good markets.

A survey including topo, tree, boundary etc is overkill for an application. The cost of the applications is double what it was a couple years ago. GIS data in most of South Carolina is good enough for an application. If a developer takes a reservation and can't build because of grades, trees, etc, then they should not be allowed to submit new apps for a period of time. This is better than making everyone spend \$10,000 plus on surveys when we have good enough data available to generally determine the viability of a site.

Thanks,

Drew

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