

SC Housing 2022 Draft QAP Comments

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Page #	Topic	Comment
8	Innovation Set-Aside	How will this set aside be awarded? At Pre-Application or at Full Application? What is to become of an Application that applies for this set-aside and is not selected? Is it then put into another appropriate set-aside or is it dismissed entirely?
11	Site Control, Ground Leases, and Scattered Sites	If the Application submits a purchase option or purchase contract, are there any set requirements from the Authority around “date certain performance”? It is assumed that the option or contract must be valid a minimum of 6 months or until final awards are announced.
15	City/County/Legislative Notification	Please clarify the sentence “The Authority will deliver the letters.” Does this mean that the Applicant must send the letters to the Authority and then the Authority will deliver them to the appropriate government official? Or will the Authority be sending out these letters on behalf of the Applicant entirely?
16	Noise Mitigation	Will the Authority allow Applicants not requesting HOME funds to also submit a noise mitigation study if the proposed site exceeds decibels threshold levels acceptable to HUD and/or the Authority? As written, it seems that only Applications requesting HOME funds will also be able to submit a noise mitigation study in order to comply with HUD’s and/or the Authority’s applicable noise requirements.
18	Cost Reasonableness	Due to the rampant construction costs increases due to the COVID 19 pandemic, it would greatly assist Applicants if they were provided more transparent expectations of what the Authority determines as reasonableness of project costs prior to submitting applications. As with several other neighboring states, it is suggested that the Authority utilize per-unit cost limits by the HUD PIH Office of Capital Improvements with increased levels of adjustments due to the cost increases of Covid-19. These have been found to be more than reasonable costs calculations and provide Applicants a more transparent expectation of how the Authority’s views cost reasonableness.
19	Annual Operating Expenses	Given the rapid increase in labor and repair costs due to the ongoing COVID-19 pandemic, the Authority should either increase the range of operating expenses per unit per year or simply remove the maximum cap. They are currently too stringent and may cause Applicant’s to submit operating expense budgets that are lower than what is needed to operate their properties effectively.
22	Palmetto Opportunity Index	Can the POI scores be posted with their full census tract numbers? It has been difficult to locate these census tracts with our current database and analyze the POI score data table without the full census tract numbers.

22	OnTheMap Job Tool	OnTheMap most recent data is 2018. Given how much the labor markets continue to shift due to the ongoing COVID-19 pandemic, this scoring parameter is outdated and should be removed or replaced with another positive site characteristic scoring measure. Alternatives could include awarding Applicants to being close to public transportation or amenities, such as a grocery store, drugstore, and/or school.
25	Revitalization or Local Policies	The Authority should consider a dual scoring track that many other states current utilize in their QAPs with one track being a stable community track and other being a community revitalization track. As currently written, the QAP heavily favors applications in stable communities (i.e. communities that have high POI scores). Meanwhile, applications located in qualified census tracts have much fewer scoring opportunities given that their POI scores will be significantly lower than their stable community counterparts. Awarding applications one single point for being in a qualified census tract is not enough to make up for the loss of points due to their low POI score. Instead, the Authority should consider increasing the number of possible points in the revitalization and local policies point section, but only allow applications to take points under the POI scoring section or the revitalization and local policies section, not both.
E-5	Developments Utilizing Non-Competitive Tax Credits with Tax Exempt Bond Financing	Can the Authority please make the language in this section clearer? It is difficult to discern what rules and regulations are intended for 4% or 9% LIHTC applications. Additionally, could the Authority delineate any rules and regulations differences between applications planning to use 4% non-competitive tax credits with tax exempt bond financing issued by the Authority and applications planning to use 4% non-competitive tax credits with tax exempt bond financing issued by a local issuer.