



SCSHFDA

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We recommend the following changes, clarifications and deletions to the in APPENDIX B, Section III – MANDATORY NEW CONSTRUCTION DESIGN CRITERIA.

- Radon Mitigation costs \$200-\$250 per unit depending on building design. Recommend increasing radon mitigation requirements from zone 1 only as it was in prior years to include zones 1 and 2. Low risk zone 3 makes up over 80% of the state and should not require the expense of mitigation.
- Requiring Radon Resistant New Construction Practices to be used in all Radon Zones seems excessive. It is understood that Radon Resistant New Construction Practices be used in Zones 1 & 2, but not for Zone 3 areas which is the classification for the majority of the state. Also define what the Agency considers "Radon Resistant".
- Hot dip galvanizing steel adds 30% to the cost of steel products. On a project with breezeway stairs this add \$300-\$350 per unit in costs. Recommend limiting galvanizing requirements to coastal communities subject to salt corrosion. Cold galvanizing is applied in the field. Is this acceptable. No experience with this product.....
- Define "*Galvanized steel (Field Painted)*". Is this Hot dipped Galvanized and then painted in the field or Galvanized coating applied in the field?
- Countertop lighting to a level of 30 foot candles adds \$100-\$125 per kitchen. Has the lighting been a problem before? Same question 1.5 foot candles at parking and sidewalks.
- ADA ranges are no higher than 34" are permitted. ADA compliant free standing ranges typically cannot be lowered to 34" Recommend removing 34" language and clearly stating either ADA compliant drop in ranges are required or simply that ranges must be ADA compliant.
- Flooring language in wet rooms is confusing. While sheet vinyl, VCT, ceramic tile and LVT are all acceptable forms of flooring in wet rooms, only LVT is singled out as having to be minimum 15 year warranty and 100% waterproof. Vinyl is waterproof already while VCT is not. Recommend revising language for clarity.
- Dumpster Pad approach is required to be 12" thick concrete. Recommend continuing to require concrete but letting engineer design the approach based on loads in the same way heavy duty paving is designed based on soils characteristics. Some approaches may be large making the 12" standard very expensive.
- Consider allowing asphalt parking on townhomes and single family projects as it is typically less expensive depending on the area being paved.

- Requiring a 48" minimum clear path of travel through building breezeways and public/common use stairways will push the breezeways to 10 feet wide from stud to stud. Typically, developments are 9 feet wide in these areas and have been acceptable. Why is this necessary?
- Parking area site lighting required at an average foot-candle of 1.5. There needs to be an exception allowed for areas where the municipality has a lower requirement for "dark skies".
- *"Brick must be installed per manufacturer's requirements to achieve at least a 30 year warranty."* - Most Brick manufacturers do not provide a 30 year warranty. We recommend amending this to say...*"Brick must be installed in accordance with manufacturer's warranty requirements"*.
- *"Siding applications require all exterior penetrations to be installed in plastic J-boxes."* Please clarify whether or not this includes cement siding.
- Asphalt Shingles...*"Must be High Quality and Durable"* – Define "High Quality"
- Asphalt Shingles...*"Leak barriers must be of the same brand as the shingles being installed and be the mineral surfaced type"* - Not all shingle manufacturers produce an underlayment. However, most specify an underlayment type. Is this acceptable?
- Asphalt Shingles...*"Each shingle is to be step flashed. Continuous flashings are not acceptable"* – Shed roof designs like what is above most porches with a wall above must have continuous flashing. Step flashing will not work.
- *"All buildings must be wrapped with an exterior air and water infiltration barrier. All wall penetrations are to be taped for moisture protection."* Is Zip Wall Sheathing acceptable?
- *"Have appropriate design for exterior finishes...Windows installed in brick or stucco veneer should not have a J-channel"* - Some window manufacturers allow windows with integral "J" channel to be used at brick locations. Would this be permissible with documentation from the window manufacturer?
- Recommend removing sub-metering requirement for multi-story senior projects. The upfront and ongoing operational costs are more expensive than the owner paying for the resident's water, and it is not required for Energy Star Multifamily Portfolio Manager. For family projects in large buildings that are master metered we agree with adding water sub meters.
- Recommend changing minimum electric water heater efficiency in 13.a. from .93 UEF to .92 UEF. Energy Star Multifamily can be achieved without the higher efficiency water heater which adds \$400 per unit to costs.

Respectfully,

Connelly Builders, Inc.