

From: [Sarah Jones-Anderson](#)
To: [TaxCreditQuestions](#)
Cc: [Amie Cofini](#); [Tanya Eastwood](#)
Subject: [External] SC Housing 2023 QAP
Date: Monday, September 26, 2022 3:28:55 PM

Good afternoon,

Thank you for circulating an updated draft of the SC Housing QAP and for holding another public forum. Below are the comments from Greystone Affordable Development.

Ranking:

- By ranking projects from lowest need to highest need, unrealistic building costs may be presented in a “race to the bottom”. We suggest focusing on how the resources make up the total development budget (percentage of total development cost or, as found on page 34, state resources per dollar of total project costs) rather than resources per bedroom, tenant, or square foot.
- We also ask the rural adjustment be reevaluated as 30% is significant.
- We do not believe strong projects should be considered ineligible if there is an insufficient amount of STC remaining; but that the developer should be given the opportunity to fill the gap in other ways.

Section III.G. (page 7) - The removal of the Junior Developer will have a negative impact on smaller, but capable, developers that want to make an impact in South Carolina. We ask that this language be reverted back to the 2022 language.

Section III.J.2.d. (page 9) – Deals within a mile of a 2020, 2021 or 2022 awarded development should not be disqualified if a market study can justify the location and unit count.

Section III.K.2.d (page 10) – Please confirm that this section means the VCC must be executed, but not the actual work as that would be completed during construction.

Appendix C2, Tax Exempt Bonds, Section II.B.5 (page 32) – A minimum of seventy units is limiting; we ask that this requirement be removed.

Appendix B – Design Criteria

Section I.B.1. - Modification Requirements: It is common practice and acceptable under both ANSI and FHA requirements for future grab bar installation to be an adaptable feature. Grab bars should not be required to be installed in Type A units or Type B units upon completion of construction.

Section I.C.15 – Does this certification for lead-free pipes, solder and flux apply to rehab projects?

Section III.B.1 – Unit Size and Base Requirements

The minimum square footage for a one bedroom should be 700 square feet. This is aligned with the market and encourages a more efficient building footprint.

Section III.B.5.a - Bathroom Requirements: Three-piece surrounds should be allowed. The one-piece requirements create undue limitations on fixture procurement, and a three-piece surround over tub/shower base with tile flange offers no degradation in quality of finish or performance.

Section III.B.6.A - Unit Patios and Balconies: The minimum area of patios and balconies should be reduced to 60 square feet which would be the approximate size of a 10 foot by 6 foot porch. This small reduction would allow for greater flexibility in design while still encouraging large, functional porches. Do patios require railing?

Section III.F Building Exterior - Exterior Stairs, Railing, Columns, & Signage: Exposed, pressure treated wood joists should be allowed for porches with composite deck boards if provided with a paint or solid stain finish. The current language is confusing and implies that all wood should be fully concealed. It is common construction practice in market-rate housing to provide exposed, stained, PT wood joists with fiber cement fascia. This would align the QAP with market-rate projects without a degradation in quality. Cap flashing could still be provided on exposed joists that are cantilevered and penetrate the exterior wall. Additionally, the language should be revised to state “nominal 5/4” composite deck boards as true 5/4” (or 1 ¼” thick) composite deck boards are limited in commercial availability.

Section III.F Low Slope Roofing: Minimum warranty for low-slope membrane roofing should be reduced to 20 years. This is the standard warranty for most roofing manufacturers. A 30-year warranty limits available products and manufacturers, and equates to additional construction costs with no demonstrable return in investment.

Section III.H.3 Building Envelope: This section should be clarified to allow unvented attics when designed to meet the requirements of the IBC and IRC for unvented attics. Low-slope roofs with continuous insulation are very common in multifamily wood construction and allowed by the IBC. They provide for a continuous thermal envelope that is more energy efficient than a vented attic.

Section III.I.1.c Bedroom Doors: Minimum bedroom door widths should be reduced to 2-10 for Type B units. This meets ANSI and FHA requirements and provides adequate width for mobility and furniture movement.

Section III.K.8.e Type A Units: Factory-installed grab bars should not be required. Grab bars are a common adaptable feature that meet the requirements of both ANSI and FHA. If grab bars are still to be required, then they should be allowed to be field installed. Factory installed grab bars often do not meet ANSI requirements.

Section III.O.6 Mechanical: Duct board should be allowed within dwelling units. This is a common practice in market-rate apartments and condominiums and does not result in degraded quality or performance.

Section III.P.2 – multi-story properties should not require sub metering.

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