

From: [Joseph Kass](#)
To: [TaxCreditQuestions](#)
Cc: [Robinson Villa](#); [Taylor Davis](#); [Wilbourne, Kim 6-9083](#); [Tyler, John 6-9077](#)
Subject: [External] public comments to draft 2023 QAP
Date: Friday, August 26, 2022 2:13:15 PM
Attachments: [image001.png](#)
[image002.png](#)

Thank you for this opportunity to submit the following additional comments on the draft 2023 SC QAP:

QAP Page 6. III.D.3. “**Geotechnical Soil Reports**” – please clarify to allow Geotech reports where the original boring report is dated within the last 2 years as long as the soil consultant will certify as of the new application date that conditions have not changed and that the existing soil boring plan meets the QAP standards.

Appendix C1, I.B.2. “**Award Limitations**” – in the section that specifies ‘no more than 1 new construction award per county’, please allow exceptions for ‘no more than 2 per county in the top four largest SC counties by population’. (Covers Greenville, Richland, Charleston, Horry in that order). Some of these counties have double, triple, or quadruple the populations of other counties, and would thus need to allow for more than 1 award to be proportional and fair.

Appendix C1, I.B.2. “**Award Limitations**” could also say “no more than 1 new construction award per county *per pool*.” This would allow an award under INNOVATION without competing directly with the GROUP A or GROUP B.

Appendix C1. III.B.4. “**Innovation**” – please clarify that applications submitted for consideration in this pool will automatically roll into the other General pools for competition if not selected for funding within the Innovation pool.

Appendix C1. III.B.4. “**Innovation**” please consider adding language to clarify that an award under the INNOVATION pool will not count against the limit 1 new construction award per county under Section I.B.2.

Appendix C1. III. D. “**Size Requirements**” – please clarify that Group A Counties cannot exceed more than 90 **affordable** units, and Group B Counties cannot exceed more than 60 **affordable** units.

Appendix C1. IV. A. “**Distance to Amenities**” – consider making the maximum number of points under secondary amenities 16, 17, 18, 19 or 20 instead of only 15. This will ensure sites with plenty of local amenities and a variety of options for future residents.

Appendix C1. IV. A. “**Distance to Amenities**” – SC Housing may want to clarify that driving distances can be **to or from** the site and amenity using Google map driving distances. The NC QAP includes this language which corrects any data issues when Google maps shows divided highways or no left turns when actual real world conditions differ from Google maps.

Public Transportation: Consider adding a points for being on a bus route or within 0.2 mile of a bus

route, this was part of the old SC QAP. It is also found in the NC QAP in the same section as driving distances. Residents who live in affordable housing are very likely to utilize public transportation, and by definition are living on tighter household budgets that would benefit the most from having public transportation nearby.

Walkscore – the NC QAP includes a Walkscore component. This could be a tiebreaker for SC, or a small point item. Our suggestion would be to multiply the Walkscore by 0.1 and add those points to the overall score, so for example a 32 Walkscore would add 3.2 points to an application total, and a Walkscore of 45 would add 4.5 points to an application. A Walkscore works well to both complement and balance out the driving distances. A Walkscore is also very easy to look up and verify for both applicants and SC Housing staff.

Appendix C1. IV. A “**Distance To Amenities**” - Please clarify whether a typical dollar store (Family Dollar, Dollar General, etc.) qualifies under the Shopping/Big Box store the same way as a Big Lots, Roses, etc. The well-known dollar store chains have a variety of frozen foods, boxed and canned foods, household items, clothing, cleaning products, personal hygiene, etc.

Appendix C1. Section IV.D. “**Affordable Housing Shortage**”, please consider adding some points for the counties experiencing the most acute housing shortage, even if just 1 or 2 points. Counties such as Greenville, Charleston, Horry and York are growing at a rapid pace, adding many new jobs and population. The new QAP should include at least some point criteria to recognize the housing shortage in the counties. The previous QAP had up to 10 points for those counties, perhaps that was too many points, but some recognition of what is happening in those high population growth counties would indicate at least 1 or 2 points being appropriate to address the affordable housing shortage.

Appendix C1. Section IV. E. “**Other types of Tax Credits**”, please clarify that these are tax credits including Textile, Historical, New Market, Abandoned Building, etc. We would recommend that SC Housing explicitly state that this point category does not include other tax credits, such as energy tax credits, at this time.

Thank you,

Joseph Kass

Development Manager – C3P, Certified Credit Compliance Professional



Mail: PO Box 5539 | 29606 | [REDACTED]

Physical: 325 Rocky Slope Road, Suite 301 | Greenville, SC 29607

[REDACTED] | nhe-inc.com

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