

From: [Robinson Villa](#)
To: [TaxCreditQuestions](#)
Cc: [Joseph Kass](#)
Subject: [External] NHE, Inc. - 2023 Draft QAP Comments
Date: Monday, September 26, 2022 1:24:26 PM
Attachments: [image001.png](#)
[image002.png](#)

Hello,

Below are comments that we have to the current draft of the 2023 Qualified Allocation Plan. Thank you for allowing us to assist SC Housing in preparing the QAP.

Appendix C1, I.B.2. “Award Limitations”

To reiterate our previous comment and echo the comments heard during the most recent Public Hearing, 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.

Section III.L.3. – Projects utilizing the average income minimum set-aside many not contain market rate units.

Please add language to clarify that market rate units will only be allowed for developments utilizing the traditional 40@60 or 20@50 election.

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. Please explicitly add the term “dollar store” to this section of the QAP if in fact that is the intention.

Section IV.A.Driving Distances – “The measurement will be at any point of the site’s road frontage to or from the amenity entrance and the same site entrance will be used for all measurements.”

Please clarify whether the intent of this sentence is that the phrase ‘site entrance’ applies to the ‘LIHTC site entrance’ or the ‘amenity site entrance’. Should measurements all be from one location along the road frontage regardless of whether or not that road frontage is the designated entrance on the site plan, or should measurements be taken from only the specified site entrance as labeled on the site plan. We support using any location along the road frontage of the LIHTC development to avoid issues of development teams placing their entrances in unusual or unlikely locations just to improve driving measurements. Using the road frontage is a simple and common sense approach.

Section IV.A.4 - R/ECAP

Please include instructions for where to get this data and how to determine whether a census tract is a R/ECAP. Perhaps publish a table addendum.

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 these 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.

Section III.J.2.e. – “Applications will be disqualified if within 1 mile of a 2020, 2021, or 2022 development”.

Please remove the prohibition against 2020 awards and reduce this to just 2021 and 2022. 3 years is a long time to make an area off limits. 2 years should allow for construction and lease up. SC Housing should also consider adding the clarification that applications will only be disqualified if the 2021 or 2022 development has not been Placed In Service and reached stabilized occupancy.

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