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From: Tracy Doran [REDACTED]
Sent: Monday, July 3, 2023 12:52 PM
To: Wilbourne, Kim 6-9083
Cc: Rosie Doran
Subject: [External] Comments to 2023 QAP for program year 2024

Hi Kim,

Thank you for the very positive and informative QAP hearing last week. It was a nice opportunity to network with staff and fellow developers.

Below are our comments to the 2023 QAP:

1. QAP page 8, Section J, 2E: Applications for new construction developments located within one (1) mile of a 2021 or 2022 awarded new construction development. This item is very detrimental to urban areas where the demand is critically high for affordable housing. In the City of Charleston the whole peninsula is one mile wide and there are multiple sites in line to apply for both 4% and 9% tax credits. If one development is funded it will eliminate other sites from competing for two more years. If this item is left in the QAP and you hold a 4% bond round for developments that don't need state tax credits before the end of the year, a development could be awarded before other developments even get a chance to apply. We request that this item be eliminated.
2. Appendix C-1- 9% LIHTC page 2, Section B 2 : The Authority will not award more than (1) new construction application per county that received and award of tax credits in the prior year and will not award more than (2) in all other counties. This is very limiting for urban counties. We suggest that urban areas be allowed two allocations per year regardless of award in the previous year.

Thank you for your consideration and have a wonderful 4th of July.

Tracy Doran
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