



OFFICE OF THE JASPER COUNTY ADMINISTRATOR

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Andrew P. Fulghum
County Administrator

Tisha L. Williams
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June 30, 2023

VIA Electronic Mail Delivery

Ms. Kim Wilbourne, LIHTC Manager
South Carolina State Housing Finance and Development Authority
300-C Outlet Point Blvd.
Columbia, SC 29210

Re: 2023 QAP Comments

Dear Ms. Wilbourne:

I am writing on behalf of Jasper County, South Carolina, to address concerns regarding the impact of current policies and criteria implemented by the 2023 South Carolina Housing Authority's QAP. Our goal is to foster equitable development in high demand, less dense communities like ours and to ensure that Jasper County, which has been without an award of Tax Credits for a newly constructed development since 2008, is given fair opportunity to meet the growing housing needs of our residents, businesses, workforce and the surrounding communities.

Communities like ours have struggled to attract developers because of our disadvantaged scoring in the tax credit program. Jasper County's inclusion as a Group A/High Demand Area is an acknowledgement to our critical need, however, we are requesting proactive and equitable changes to the scoring methods used in the Group A Set-Aside for the more rural areas like Jasper County. We acknowledge that the federal and state tax credit programs are of critical importance for most developers to produce financially viable housing at truly affordable rents. Furthermore, we know housing development leads to economic growth, long-term community stability, and increased quality of life for all South Carolinians. We should not exclude residents from economic opportunity because they live in areas whose environmental characteristics are inconsistent with traditional urban growth patterns.

Unlike other rural areas, Jasper County land costs, particularly in the growth pattern, are pricey and increasing. Buildable land is impacted by the extensive presence of waterways and wetlands. Construction costs are high because of these same environmental factors and others, including our proximity to the coast.

The South Carolina Housing Authority can stimulate much-needed development in our community by implementing the following changes:

1. **Rethinking Pharmacies:** With the rise of the availability of pharmaceuticals by mail, the current QAP standard for pharmacies is outdated. If removing the category altogether is not possible, we propose accounting for the lack of physical pharmacies in more rural areas to avoid placing these communities at a disadvantage.
2. **Population-Based Disadvantage:** Jasper County's low population concentration in comparison to other counties affects our QAP scores. Our county has the lowest population concentration among Group A counties. Georgetown has the next lowest population concentration, and its population concentration is 50% greater than Jasper's, while Aiken's population concentration is nearly 400% greater than ours. This population disparity puts us at a clear disadvantage when it comes to scoring well in the QAP, particularly in measuring distances to essential services and jobs. It is crucial to recognize that despite these challenges, the need for housing in Jasper County remains significant for our residents. While we are considered a rural and underdeveloped county, we share a border with one of the fastest-growing, and second wealthiest counties in South Carolina, Beaufort County. A large portion of our residents commute to Beaufort County and are an integral part of their workforce. Because of the rapid development of greater Bluffton and Beaufort, we are seeing an increase in demand for more affordable housing in our community. In addition, growth from Jasper County to South Carolina's southern border and beyond is occurring due to proximity to valuable economic infrastructure, particularly the logistical delivery systems of I-95, the Savannah Port and the Savannah International Airport, all of which are continuing to attract new businesses and higher density single-family residential communities to Jasper County.
3. **Addressing Environmental Barriers:** The QAP overlooks the prevalence of rivers, estuaries, and wetlands in the Lowcountry, making it difficult to score sites within a 1-mile radius. We request the inclusion of measures, like off-setting points for nearby wetlands or other waterways, that mitigate environmental factors to ensure equitable evaluation as well as increasing the distances to Amenities to greater than 1 mile intervals to earn maximum points.
4. **Distance to Jobs:** There is currently no location in Jasper County where any points can be earned in this category, which favors a far more urban environment with concentrated employment centers. In the most recent year in which tax credit awards have occurred, 9 points have meant the difference in award status. Therefore, decreasing this category point value from 10 to 5 should be considered to reflect the reality of development challenges in High Demand, less concentrated population areas.

5. **Revised High Demand New Construction Set-Aside:** To address the distinctly different housing and development needs of urban and non-urban areas, we suggest splitting the High Demand New Construction Set-Aside into two categories based on a population per square mile threshold of 250. Allocating tax credits evenly between these categories would foster balanced development.
6. **Incentivizing Counties without Past Tax Credits:** To increase equity within the program, and to encourage applications from counties that have not received a 9% tax credit in the past 10 years, we recommend increasing the points value in this category from 5 to 15. This increase will promote a fairer distribution of tax credits and stimulate broader participation and economic growth across South Carolina.

By implementing these proposed changes, we firmly believe that the South Carolina Housing Authority can promote equitable development, stimulate economic growth, and meet the diverse housing needs of our State, especially those in our prized, environmentally sensitive, economically strong, Lowcountry communities. We welcome the opportunity for further discussion and collaboration to find practical solutions and increase our economic potential statewide.

Sincerely,



Andrew P. Fulghum, ICMA-CM