

Additional Point Criteria:

- A scoring criteria that would be beneficial for South Carolina is a system similar to the “Stable Communities” scoring that Georgia utilizes in their QAP. The points are census tract based and allow for points to be claimed when projects are in more affluent areas based on objective point indexes. This provides developers, Cities, and other partners with two tracks to reach a successful deal; either through the Community Revitalization Plan track or the Stable Communities track allowing for more sites to be eligible for the LIHTC program. Please see attached to this document the scoring detail and indexes Georgia utilizes for this scoring.

Regrouping Set-Asides

- We would be in favor of regrouping the set-asides to three separate groupings labeled as: “High Demand/Large Urban”, “Rural”, and “Other Metro” set-asides
 - High Demand/Large Urban – this set-aside should be Greenville, Richland, Charleston counties. This could also be expanded to include the “collar” counties around those main counties or shrunk to only include the city limits of Greenville, Columbia, and Charleston. This would allow the larger metro areas to compete only with themselves and not “box out” some of the smaller metro areas in the state that don’t have access to the resources that Greenville, Columbia, and Charleston do.
 - Rural – this set-aside should be reserved for applications that are in rural areas as defined by the USDA map that are also **NOT** located in one of the counties represented in the High Demand/Large Urban set-aside. This allows for a specific and targeted effort for rural deals to appease the State Legislator however it prevents applications from being technically located in a rural area per the USDA map but on the edge of some of the large urban areas of the state
 - Other Metro – this set-aside should be defined by applications that do not meet either of the two above criteria. This would allow the middle income counties to have a fighting chance and not have to compete with the large urban areas as well as not soak up resources for the rural areas.
- **TEB Ranking/ Round/ Timing**
 - There should be a pre-application round for the TEB cycle. This past TEB round was seen as very risky and an “all or nothing” application by developers. Having a pre-application round that gives us a true ranking **before** we invest several hundreds of thousands of dollars in a project. This would encourage more applications and a better pool of deals.
 - There needs to be some type of location based scoring for the TEB application cycle. The current ranking system fully encourages to go build the biggest, cheapest, project in a rural area to guarantee an award and if this system remains as is all deals will be located in areas that will have long term lease up and operating liabilities.
 - There needs to be an appeal process or at the very least a cure period for bond applications submitted. It is incredibly frustrating to have an application disqualified with no opportunity to cure the issue.

Minimum/Maximum Unit Counts

- Please do not decrease the maximum allowed unit count. There many been many long fought battles to get cities more comfortable with higher densities and we cannot go back to them and relay that after all of the hard work we are arbitrarily capped by the QAP. Instead we recommend reducing the maximum credit cap per deal. This will naturally spread the 9% credits farther across more deals and if we the developers would like to build more units than the credits can finance it should be on us and the cities we are partnering with to identify the gap financing to do so.