

From: [Quincy White](#)
To: [TaxCreditQuestions](#)
Cc: [Missy Luick](#); [Shawn Leininger](#)
Subject: [External] 2025 Qualified Allocation Plan Comments
Date: Friday, August 16, 2024 5:07:38 PM
Attachments: [Outlook-i20fhpy.png](#)
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I appreciate the opportunity to provide feedback on the South Carolina Housing Finance and Development Authority's forthcoming Qualified Allocation Plan. Below, I have outlined our recommendations:

- **One per County:** This restriction will significantly impact Beaufort County and Hilton Head Island's participation efforts, especially given our population exceeds 250,000. The current approach doesn't adequately address population needs across the state and within the county.
- **Measurement Area:** We recommend increasing the measurement area to allow for opportunities in areas without large urban centers and brick-and-mortar headquarters to score points.
- **Healthcare:** Consider changing the language to include "hospital, urgent care, general family practice, or volunteer-led medical services."
- **Jobs Criteria:** We propose increasing the job proximity criteria to 10 miles, considering waterways and tourism-based communities like Hilton Head Island, where commuting is more common. The location of many jobs in these counties is in extremely high-cost land locations (e.g., near the ocean), making them further from affordable housing. The distance requirements should be adjusted equitably.
- **Waterways:** Waterways divide land, impacting the calculation of miles. We suggest increasing distances for counties covered by water, streams, rivers, wetlands, and marshes.
- **Proximity to Amenities:** The new proximity to amenities proposal, with a maximum of two amenities, is outdated given the current access to delivery options. We recommend removing the requirement of a nearby big-box store, as it negatively impacts counties that favor local stores.
- **Tiebreaker:** The current tiebreaker criteria heavily weigh on the municipality's willingness to participate. We believe this needs to be balanced more effectively.
- **Creation of Group C for Coastal and Resort Cities:** We recommend creating a Group C specifically for coastal and resort-type cities like Myrtle Beach and Hilton Head. These

cities have a large number of seasonal workers and a significant tourist population. Under the current QAP grading system, Hilton Head grades low, despite its largest employer, the SERG Group, having roughly 1,500+ employees. This adjustment would more accurately reflect the unique needs and challenges of these communities.

- **Points Allocation:** We suggest that points awarded should correspond to the number of years since the last LIHTC award for new construction.
- **Proximity to Title 1 Schools:** Consider allocating points based on the proximity of Title 1 schools to ensure affordable housing developments support families with children attending these schools.

Thank you again for considering our feedback.



Quincy A. White

CHIEF HOUSING OFFICER

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