

Mayor
Harry Williams
Mayor Pro Tem
Valarie Guzman



Councilmembers
John Carroll
Steve Meersman
Bo White

August 7, 2025

Ms. Kimberly Wilbourne
Tax Credit Development Manager
SC Housing

RE: Comments to Draft SC Housing QAP

Dear Ms. Wilbourne,

On behalf of the City of Hardeeville, I submit for your consideration the following comments to SC Housing's draft of the 2026 Qualified Allocation Plan in order of importance:

1. General - Jasper County, despite being the fastest growing county in South Carolina (1), hasn't benefited from a tax credit allocation for newly constructed apartment homes in 17 years. In recent years, most potential developments have not been able to accumulate enough points to risk the pre-development costs associated with an application. Those who did risk the pre-development cost investment received scores that were well below the level necessary to receive a tax credit allocation. Please make whatever changes to the scoring criteria are necessary for prospective developments in Jasper County to have a reasonable opportunity to compete.
2. III. A. 1. Distance to Amenities – Please entirely remove the distance to pharmacy as a scoring line item. Available parcels in Hardeeville are extremely limited, and our chances to use a parcel to develop affordable apartments are dwindling. Each year that passes without sufficient changes to the QAP to enable Hardeeville developments to access tax credit allocations results in more land being developed in our growing area for uses other than affordable housing. This, in turn, increases the demand for affordable housing.
3. III .A. 3 – Distance to Area Employment - According to the Bureau of Labor Statistics (BLS), for the period of 2014 thru 2024, Jasper County has the 2nd highest job growth rate in the state. Yet, according to the U.S. Census Bureau's OnTheMap tool for the Longitudinal Employment Household Dynamics database, almost the entirety of Jasper County, including the downtown area of Hardeeville, which we are actively working to re-develop, scores 0 out of 10 possible points. There exists one small area that could potentially score 4 points but is undevelopable for each of public

road access and available land, and the presence of significant wetlands. Please utilize BLS data in lieu of the current data set for this line item or, at the very least, balance the current data set with BLS information. As you know, with the tight range of scores for awarded projects, a loss of 10 points, or even 6 points, is impossible to overcome.

4. I. B. – Award Limitations – At the recent Roundtable, there was discussion about potentially reducing the amount of tax credits awarded to a development in a Rural County from \$1,750,000 to \$1,350,000. We would support such a change as long as the new cap amount doesn't include the tax credit amount associated with the 30% basis boost for projects which are actually located in a HUD designated Qualified Census Tract or Difficult to Develop Area (some of Jasper County).
5. II. A. 2. County Groups/Rural - At the recent Roundtable, there was discussion about dividing the Group B/Rural Counties into two groups. We would need to know the delineation criteria in order to formulate an opinion on this prospective change.
6. III. A. 2 – Distance to Public Transportation – This line item should only be applicable to Urban Counties.
7. III. B and F – Land Donation and Leveraging – The City Council has approved the gifting of a parcel in order to achieve the five (5) points previously designed to reward such an investment. Because of the timing of the City taking title to a portion of this parcel, we weren't able to use it in a 2025 application. Should the Land Donation criterion change or be combined with Leveraging in any way which diminishes the value of this contribution, then we are against it.
8. III. D. Affordable Housing Shortage – Please consider a scoring category awarding 15 points to applications for developments located in counties with no new construction awards in the previous 15 funding cycles.

Thank you for your consideration of our suggested changes.

Sincerely,



Harry Williams,
Mayor

- (1) <https://www.islandpacket.com/news/state/south-carolina/article306807111.html>