

Please remove the pharmacy line item from the Rural New Construction Category and increase the points awarded to projects for land donated by a local government or school system.

According to <https://www.healthcare-brew.com/stories/2024/12/13/study-retail-pharmacies-closed-between-2010-2021>, more than 1 of 3 retail pharmacies closed between 2010 and 2021. CVS announced in late 2021 that it would close 900 stores over a three-year period, from 2022 to 2024. The company is closing an additional 270 locations in 2025. In October 2024, Walgreens announced a plan to close 1,200 underperforming stores over three years. This followed the closure of 484 locations between February and June 2024. After filing for Chapter 11 bankruptcy in October 2023, Rite Aid has been systematically closing locations. After a second bankruptcy filing in as many years in May 2025, the company announced it would close or sell off its remaining stores.

Clearly, retail pharmacies are all in the midst of mass closures and a state of rapid decline. Thankfully, the ability to receive prescriptions by mail from Amazon and even CVS and Walgreens, is offsetting this decline, and becoming the standard for prescription drug distribution. Given the foregoing, placing any emphasis in the scoring criteria on the proximity of a site to a pharmacy, which is based entirely upon its existence at a specific point in time, let alone awarding up to 14 points (which likely amounts to more than 10% of a winning score), fails the test for a sustainable amenity as a pharmacy could close immediately following a tax credit application cycle or anytime during the life of a funded project.

We believe it be better for all parties, including SC Housing, to place equitable scoring emphasis on items that will clearly remain assets in place for the duration of the project such as a land donation, which provides the added benefit of leveraging SC Housing's funds and thereby enabling it to fund more projects than it otherwise could.

We respectfully request SC Housing remove pharmacy as a scoring line item and increase the points for land donation from 5 to 10.