



OFFICE OF THE JASPER COUNTY ADMINISTRATOR

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Andrew P. Fulghum
County Administrator

Tisha L. Williams
Executive Assistant

August 8, 2025

To: SC Housing re: QAP Comments

Re: Urgent QAP Modifications Needed to Address Longstanding Barriers to Housing Development in Jasper County

Dear SC Housing:

On behalf of the residents and Council in Jasper County, I am writing to share urgent concerns and requests related to the Qualified Allocation Plan (QAP), which, in its current form, continues to place **Jasper County—South Carolina's fastest-growing county**—at a systemic disadvantage when it comes to accessing Low-Income Housing Tax Credit (LIHTC) allocations. The consequences have been real: **Jasper County has not received a LIHTC award for newly constructed apartment homes in 17 years.**

A recent example makes the situation even clearer. A land purchase in Hardeeville for high-end market-rate housing—highlighted in the attached article—could not qualify under the current QAP due to scoring limitations such as distance to grocery store. **A similar parcel within a few mile radius was submitted and failed to receive an award due to distances from schools and pharmacies,** despite these services being fully functional through school bus transportation and home medication delivery. This land, which would NOW qualify, is no longer available. If a parcel is good enough for market-rate development, it must also be good enough for affordable housing. The fact that it is not, speaks volumes.

Further, **we are rapidly running out of available land** for housing development in Hardeeville. Every year that passes without meaningful QAP changes allows more land to be taken up for market-rate or non-residential uses, compounding the demand for affordable housing that remains unmet.

SC Housing's ongoing failure to address how the QAP disadvantages the fastest-growing county in the state has **actively caused harm**—blocking affordable housing where it's most needed—despite this being the **fourth consecutive year we've submitted comments with little meaningful action taken** to advance solutions for Jasper County.

With these comments, we respectfully submit the following urgent requests for the 2026 QAP:

1. General Scoring Competitiveness

Jasper County has not seen a LIHTC project in **17 years**. Due to QAP scoring, most potential projects have not been competitive enough to justify the pre-development costs, and those that proceeded received scores far below the required threshold.

Request: In general, please make the necessary changes to the scoring criteria to give Jasper County a fair and reasonable opportunity to compete for funding.

2. III.A.1 – Distance to Amenities (Pharmacy)

The current distance-to-pharmacy scoring line item disqualifies almost every viable parcel in Hardeeville, despite the reality that most residents now receive prescriptions via delivery.

Request: Please remove **distance to pharmacy** as a scoring line item entirely.

3. III.A.3 – Distance to Area Employment

According to the **Bureau of Labor Statistics**, Jasper County had the **second-highest job growth rate in South Carolina from 2014 to 2024**. Yet, the current QAP scoring system gives almost the entire county **0 points** for access to employment—based on outdated or misaligned datasets.

Request: Replace or supplement the current employment data set with **BLS data**. If replacement is not possible, balance it with BLS figures to ensure accuracy and fairness.

Note: This is a **critical discrepancy**—high job growth and no employment scoring cannot coexist if the goal is to encourage housing near jobs.

4. I.B. – Award Limitations

We understand discussions are underway to reduce the credit award cap in rural counties from **\$1.75 million to \$1.35 million**.

Request: We support this change **only if the new cap excludes** the 30% basis boost amount for projects in HUD-designated Qualified Census Tracts or Difficult to Develop Areas—**some of which exist in Jasper County**.

5. II.A.2 – County Groups/Rural Categorization

There has been discussion about splitting Group B (rural counties) into two sub-groups.

Request: We ask that SC Housing provide the **specific delineation criteria** for this proposal before we can provide feedback.

6. III.A.2 – Distance to Public Transportation

In counties like Jasper, traditional public transportation systems are not prevalent and not how residents commute.

Request: Limit this scoring category to **urban counties only**.

7. III.B and III.F – Land Donation & Leveraging

The City Council of Hardeeville has voted to **gift a parcel** specifically to help a development earn the current 5-point bonus under the Land Donation criterion. However, due to timing, this parcel couldn't be used for a 2025 application.

Request: Do not diminish the value of land donation by combining it with Leveraging or altering the point structure. If anything, this type of public investment should be more strongly rewarded.

8. III.D – Affordable Housing Shortage

Jasper County has had **no new construction LIHTC awards in the past 15 funding cycles**, despite surging demand and job growth.

Request: Add a scoring category that **awards 15 points** to developments located in counties that have not received a new construction award in the last 15 years.

Jasper County's growth, workforce demands, and housing needs will not wait. But we **can still course-correct**—if SC Housing updates the QAP to reflect the realities of communities like ours. We are committed to being a partner in this effort and stand ready to provide data, feedback, and support as needed.

Sincerely,

A handwritten signature in blue ink, appearing to read 'APF', with a long horizontal flourish extending to the right.

Andrew P. Fulghum, ICMA-CM

CC: Jasper County Legislative Delegation

Ellen Drake-Howard - Jasper County Legislative Delegation, Administrative Assistant

Email: [REDACTED]

Chairman of Jasper County Delegation, Rep. William Winston "Bill" Hager

Committees: Labor, Commerce and Industry

Email: [REDACTED]

Sen. Margie Bright Matthews

Committees: Ethics, Finance, Labor Commerce and Industry, Legislative Oversight, Medical Affairs, Transportation

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Vice-Chairman Sen. Tom Davis

Committees: Banking and Insurance; Corrections and Penology; Finance; Labor, Commerce & Industry (Chairman); Legislative Oversight; Medical Affairs

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Rep. Wm. Weston J. Newton

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Rep. Jeffrey A. "Jeff" Bradley

Committees: Education and Public Works (1st Vice Chair); Regulations and Administrative Procedures (Chairman)

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Referenced Article:

https://www.islandpacket.com/homes/article311609217.html#campaignName=hiltonhead_morning_newsletter