

From: Britni Grimes [REDACTED]
Sent: Monday, September 22, 2025 3:22 PM
To: Taxcreditquestions
Subject: [External] 2026 Draft QAP Comments

Kim,

I have a few comment for the 2026 QAP:

Appendix C1

1. I.B.2. Award Limitations

The Authority will ~~not~~ award up to two (2) new construction applications per county in Urban counties and ~~more than~~ one (1) new construction application per county in Suburban and Rural counties. Urban counties receiving two (2) awards will be limited to one (1) award in the next year's application cycle.

Please consider removing "Urban counties receiving two (2) awards will be limited to one (1) award in the next year's application cycle."

2. III.A.1. Distance to Amenities

Retail – any grocery or shopping as defined above; any strip shopping center with a minimum of 4 operating establishments; or any general merchandise establishment. An establishment used for points in another category will not eligible for points in the Retail category. Vape, ABC and adult stores do not qualify.

Please define general merchandise establishment and explain if/how it differs from shopping.

3. III.A.2. Area Employment

3. AREA EMPLOYMENT

Up to 10 points based on the number of jobs paying between \$1,251 and \$3,333 per month in a two-mile radius for ~~Group A~~ Urban counties and a ~~four~~five-mile radius for ~~Group B~~ Rural, as displayed on the U.S. Census Bureau's OnTheMap tool for the Longitudinal Employment Household Dynamics database. The Authority will use the most current year available as of the preliminary application deadline.

Applications will earn points as follows:

- 10 points for at least 5,000 jobs.
- 8 points for 4,000 to 4,999 jobs.
- 6 points for 3,000 to 3,999 jobs.
- 4 points for 2,000 to 2,999 jobs.
- 2 points for 1,000 to 1,999 jobs.

Please consider revising the points in this section to be based on the % of jobs paying \$1,251 and \$3,333 per month rather than the number of jobs. This will allow rural areas which have a large share of the jobs available paying \$1,251 and \$3,333 per month to be more competitive. As is, there are areas that are so small that they would not have 1,000 jobs within the area but a majority of the jobs which are available pay \$1,251 and \$3,333 per month. Please consider the following scoring:

- 10 points for 85-100% of jobs
- 8 points for 70-84.99% of jobs
- 6 points for 50-69.99% of jobs
- 4 points for 30-49.99% of jobs
- 2 points for 10-29.99% of jobs

4. III.B. Land Donation or Ground Lease

B. Land Donation or Ground Lease

5 points if a local government, school district or entity who received the property from a local government owns the proposed project real estate as of the preliminary application deadline and the application shows no more than either \$5,000 in the cost line-items for land and buildings or \$100 per year for a ground lease. The local government, school district or entity who received the property from a local government must have owned the real estate since at least July 31, 2024 and not have purchased or received any portion from a Principal or a related party.

Please consider revising this section to give points for land donations or ground leases from non-related parties. These accomplish SC Housing’s goal of reducing the credits needed to fund housing developments.

Thanks,

Britni Grimes

Regional Development Director

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