



August 8, 2025

Ms. Kim Wilbourne
LIHTC Manager
South Carolina State Housing Finance and Development Authority
300-C Outlet Pointe Blvd.
Columbia, SC 29210

RE: 2025 QAP Roundtable Comments

Dear Ms. Wilbourne:

Woda Cooper Companies, Inc., would like to thank the South Carolina State Housing Finance and Development Authority for the opportunity to provide constructive feedback regarding the 2026 Draft QAP.

1. Annual Operating Expenses – Qualified Allocation Plan

WCC requests a revision to the allowable annual operating expense range which is currently set between \$3,500 and \$5,000 per unit per year (excluding reserves, property taxes, insurance, and annual compliance monitoring fees).

This range does not accurately reflect current market conditions, particularly when accounting for persistent inflation, increased utility and maintenance costs, rising wages, and other upward pressures on operational expenditures. Additionally, the existing fixed range does not account for variations in operating costs based on development type.

WCC proposes the following revisions for consideration:

1. An increase in the base annual operating expense range to reflect actual current expenses — for example, adjusting it to \$5,000 to \$7,000 per unit annually.
2. Higher operating expense thresholds based on building type. For example:
 - Historic rehabilitation projects typically require more intensive maintenance and specialized materials.
 - Scattered site developments often experience increased staffing and travel costs;
 - Supportive housing communities may require additional on-site services and staff.

While WCC appreciates that the current QAP permits waivers under special circumstances, incorporating more flexibility and clarity into the standard framework would improve consistency, transparency, and the accuracy of underwriting assumptions. These changes

would support the long-term operational sustainability of LIHTC developments and contribute to the overall success and quality of affordable housing across South Carolina.

2. Affordability – Appendix C1

WCC commends SC Housing for its continued efforts to prioritize and support those in greatest need of affordable housing. Woda Cooper Companies shares this commitment and proudly manages numerous developments that include deeply affordable units targeting vulnerable populations. Based on our extensive experience owning and operating such properties, we recognize the real financial challenges that come with maintaining long-term affordability at extremely low-income levels. In particular, housing units targeted at 20% of Area Median Income (AMI) often face sustainability issues due to limited operating revenue.

To that end, WCC recommends adjusting the supportive housing threshold from 20% AMI to 30% AMI. This change will still effectively serve the intended population while helping to ensure the financial viability of these critical units. This adjustment would support long-term operational stability without compromising the program's mission.

3. Distance to amenities – Appendix C1

WCC acknowledges the importance of being well-located to amenities for residents, but recommends reducing the maximum number of amenities per category from 2 to 1. WCC believes this adjustment should be considered for both Urban and Rural counties but, minimally, should be adjusted for Rural counties to increase scoring viability in these counties which otherwise might not be competitive despite the Rural county's need for affordable housing.

4. Comment on a proposed 2-year QAP

WCC supports the idea of SC Housing moving to a two-year QAP if all data is updated on a yearly basis. WCC develops in states such as Georgia, which utilize a two-year QAP, and has found this approach to be beneficial for both agencies and developers.

- For agencies, it allows more time to gather meaningful feedback and assess the impact of scoring and underwriting criteria. This extended timeline supports thoughtful revisions and better-informed policy decisions.
- For developers, it offers stability and predictability. Knowing that QAP criteria will remain consistent over a two-year period enables developers to build a strong pipeline of applications. It also allows for deeper engagement with local communities and more thoughtful, thoroughly vetted developments, ultimately leading to higher-quality submissions.

5. Evaluation of Rehabilitation Application – Appendix C1

WCC highly suggests SC Housing keep the point given to rehabilitation applications that were submitted in the previous round. This point assists developments that need rehabilitation and have been unsuccessful in years past. WCC believes this point is vital to helping all developers and owners maintain safe and affordable housing.

6. Public Transportation – Appendix C1

WCC understands the importance of residents being located within close proximity to transportation access. However, WCC recommends the following for SC Housing's consideration:

- That the 0.25-mile distance be used for urban developments only.
- That rural developments must have a dial by ride to claim the point.
- That SC Housing only require public transportation service for 5 days a week instead of the currently proposed 6 days. WCC feels that the aforementioned adjustments will increase the potential for affordable housing development in Rural areas that may be lacking in this category, but nonetheless would greatly benefit from quality, affordable housing opportunities for residents.

7. Accessibility Training Requirements - Mandatory Design Criteria

In instances where the development team (the architect, the general contractor, the superintendent, and the applicable subcontractors) have previously completed accessibility trainings under the active accessibility requirements, WCC recommends removing the requirement for additional trainings or limiting the requirement to just one additional training. These trainings are expensive, time consuming and, in many cases, become redundant for the various development team members.

8. Exterior stairs, Railings, Columns, Signage, Patio & Breezeway - Mandatory Design Criteria

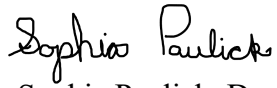
WCC recommends allowing exposed wood to construct breezeways and balconies when 5/4 decking is used as the surface material. In WCC's experience, having to construct a ceiling below the decking can trap water and debris causing increased and ongoing maintenance issues.

9. Area Employment – Appendix C1

WCC supports the use of the OnTheMap tool for area employment, as well as the entire area employment section. This section effectively targets areas with jobs that benefit residents. We would appreciate seeing this section and tool included in the 2026 QAP.

Thank you again for this opportunity to provide feedback, and we look forward to working with the Authority to bring high quality affordable housing to the great people of South Carolina.

Sincerely,

A handwritten signature in black ink that reads "Sophia Paulick". The signature is written in a cursive, flowing style.

Sophia Paulick, Development Specialist
Woda Cooper Development, Inc.

