## Wilbourne, Kim 9083

**From:** Brad Queener [redacted]
**Sent:** Friday, September 25, 2026 3:19 PM
**To:** Taxcreditquestions
**Cc:** Wilbourne, Kim 9083
**Subject:** [External] QAP comment

Please consider either removing, or reducing the points associated with, the historic/textile/mill/brownfield credits for the 2027 round. EVERY deal funded in 2026 received these points. For years the agency, along with the support and input from the development community, has worked toward a QAP that was not dependent on a single point item. We worked together to diversify the point scoring so that deals were not concentrated in one City, on one street, in one neighborhood. Goods and services points were expanded and the associated points were moderated so that one store, school, Burger King, did not mean the difference between a competitive and one that was not. This reduced land costs, as 10 developers weren't bidding on one perfect scoring site. Additionally, these points exclude any number of markets in the State that are in desperate need of affordable housing. Cities/counties like Myrtle Beach (all of Horry County to be honest), Charleston (prohibitive pricing) Dorchester and many others. The purpose of the LIHTC program is to provide safe, clean, affordable housing to the residents of South Carolina, not to refurbish mills or develop polluted sites (which has a myriad of issues associated with what you can and cannot do the soils). Given that all of the applications for 2026 have not yet been made public, it is unknown as to how much more costly these developments are on a per unit basis than a traditional ground up development (which I would bet that the "other credits" do not cover). They are certainly more risky. Enough of these deals were funded in 2026. SCSHFDA should return to a more balanced QAP that affords and opportunity for more counties to receive their fair share of affordable housing.

Sent from my iPhone