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PARTNERS IN BUILDING COMMUNITY

September 25, 2026

South Carolina State Housing Finance and Development Authority
Attn: Kim Wilbourne, Multifamily Director
300-C Outlet Pointe Boulevard
Columbia, South Carolina 29210

Re: Comments on the 2027 Draft Qualified Allocation Plan

Dear Ms. Wilbourne:

Thank you for the opportunity to comment on the 2027 Draft Qualified Allocation Plan. We appreciate the Authority's work to create affordable housing across South Carolina and thank you for your work to advance the new points-based structure for the 4% LIHTC and tax-exempt bond program. Our comments are limited to two items:

1. Appendix C2 - Eliminate Section III(C)(1) — Affordability

Current draft: Applications earn 10 points for agreeing to an average-income election of 54% / 56% / 58% AMI, or an original minimum set-aside serving at least 20% of units at 30% / 40% / 50% AMI, depending on whether the county is designated High, Moderate, or Low income.

Concern: As others described during the public meeting earlier this week, this criteria is challenging for 4% /TEB developments. For an example, a 6-point reduction in average AMI in a High-income county significantly reduces debt capacity and creates funding gaps that many deals will not be able to fill, making them infeasible.

Request: Eliminate Section III(C)(1) from Appendix C2.

2. Appendix C1 and C2 - Reduce Section III(A)(3) to 5 points, revert back to 2 miles in Urban Counties, and align the wage range with local incomes

Current draft: Up to 10 points based on the number of jobs paying between $1,251 and $3,333 per month within a one-mile radius for Urban counties and a five-mile radius for all other counties, using the Census Bureau's OnTheMap tool.

Concern: The wage range segments are national, are not adjusted for local wages or local income limits, and have not been updated for a number of years – in sum, it is no longer as aligned with the people who are going to live in the housing developments that are built. Using OnTheMap as a proxy for jobs that support residents produces very different results depending on where the site sits.

The upper bound of $3,333 per month equals $40,000 per year. Measured against the FY2026 income limits, that ceiling sits well below the 60% AMI limit in the state's high-cost markets and above it in the state's lowest-income counties:

HUD income limit area	*60% AMI limit, 1-person (FY2026)*	*Monthly equivalent*	*Section III(A)(3) upper bound*
Charleston–North Charleston MSA	$49,380	$4,115	$3,333
Beaufort County	$47,460	$3,955	$3,333
Lancaster County	$43,080	$3,590	$3,333
Kershaw County	$39,000	$3,250	$3,333
Statewide floor areas (Orangeburg, Marlboro, Sumter, Union and others)	$31,380	$2,615	$3,333

The consequence is that in higher-income markets such as Charleston, a full-time job paying $48,000 per year — a wage that squarely supports a 60% AMI unit — is excluded from the count entirely, because it falls into the "greater than $3,333 per month" segment. In the state's lowest-income areas, the same band counts jobs paying up to 27% more than the one-person 60% AMI limit.

In addition, the one-mile radius in Urban Counties doesn't necessarily correlate to building housing near jobs. Many development sites that are feasible as tax credit deals in Urban Counties are in areas that are by necessity not in the most densely populated, commercial areas of a city. While there may be many good jobs in the area, they may not be down the street.

Request: Amend Section III(A)(3) as follows:

1. Reduce the category from 10 points to 5 points, with the tiers scaled proportionately.
2. Revert back to previous QAP language that set the Urban County radius to 2 miles, instead of 1 mile.
3. Align the qualifying wage range with the incomes being served in each area. Because the OnTheMap earnings segments are fixed, the simplest implementable fix is to key the counted segments to the same County Income Level designations the Authority already uses in Section III(C)(1):

- High-income counties (Beaufort, Berkeley, Charleston, Dorchester, Greenville, Lancaster, Lexington, Richland, York): count jobs paying more than $1,250 per month, combining the $1,251-to-$3,333 and greater-than-$3,333 segments, because the one-person 60% AMI limit exceeds $3,333 per month in seven of these nine counties and falls just below it ($3,235) in Richland and Lexington; for households of two or more, it exceeds $3,333 in every one of them.
- Moderate- and Low-income counties: retain the $1,251-to-$3,333 segment, which approximates the applicable 60% AMI limits.

We appreciate the Authority's continued engagement with the development community and its willingness to listen to our comments. Thank you, and please let me know if you have any questions.

Sincerely,



Matt Ojala
Vice President, Development