Wilbourne, Kim 9083

From: Holly Douglas [redacted]
Sent: Wednesday, June 24, 2026 12:29 AM
To: Taxcreditquestions
Subject: [External] 2027 qap comments 2

Hi Kim,

I appreciated the spirited discussion of the QAP today, and I appreciated how receptive the Authority was to comments. Per your request, I wanted to restate some of my comments in writing + support some of the comments of others. Apologies for the stream of consciousness format.

1) Redline excluding nail salons, hair salons, and barber shops from retail should be removed
I feel like these are three of the most prevalent retail uses, regardless of size of the retail center. What is the basis of removing these services? We have actually proposed including beauty salons as an amenity in some of our senior communities in the past bc they are so well patronized. If one were to say it's because they provide a service and not retail goods, would one also then exclude:

-pet groomers
-massage parlors/chiropractors/wellness type places
-shoe repairs shops/cobblers
-alternations businesses
-Small-scale law firms (notary, family law) and real estate offices like RE/MAX
-businesses that provide tax services/H&R Block
-independent/local gym/fitness studio/yoga/pilates/etc
-repair shop of any kind (auto/watch/bike/etc)
-smaller insurance provider offices
-local attorney offices
-staffing agencies
-local bank branches
-daily chore places like laundromats/dry cleaners
-vino and van gogh type places
-childcare providers/daycares
-etc....

These primarily or exclusively provide a service, like nail salons, barbers, and hair salons, and in most cases also sell *some* products, though not all. Retail by definition provides a good ***or*** service....I just don't follow the logic of this change. I think it should be reconsidered.

2) **GP loans in deals and impact:** We haven't participated in the bond program recently, but from watching the point scoring and awards, i agree it would appear some (often larger, private) development companies, including but not limited to some that are affiliated with their own equity syndicator and/or GC, are effectively "buying" bond deals (or getting a big leg up at least?) by putting large sums of their own money in to reduce their ask of the state and race to the bottom quicker. If resources per unit or similar measures remain key points, this practice should be eliminated or otherwise discounted from the competitive evaluation. I agree there is a distinction between private groups doing this and government agencies/housing authorities. I also agree that if the scoring were different, it would be less of an issue or a non-issue.

3) **Proximity to "affordable" products-** I think Joseph Kass's comment about being in areas of opportunity was a good one. I was wondering about the person whose site was near a Mast General, or the site Kim visited that had shorts for $160... if you are able to place affordable housing in areas with this kind of retail, these are good areas for any kind of

rental housing. Those types of retailers are following the path of growth, the areas with growing incomes, and with those trends come more jobs, better schools, more external investment, etc. I think you want sites in these types of areas. His example of wanting to be close to Whole Foods but drive a little further to Aldi made a lot of sense to me. Being near a Whole Foods speaks to the area's nature in general as being positive, and one family or seniors would want to be in?

4) I agree with/support the addition of **more points to the site scoring**. I think variation in scores is a good thing, rather than it all funneling into 1 or 2-point items or the tie-breaker. Believe Kevin made this comment as well.

5) Agree with negative points if someone is deceptive when submitting site scores or negligent in their own due diligence. This should be different from having a disconnect with the Authority regarding the evaluation of the amenity... if that makes sense. Pre-approving unique amenities, if this stays in, would be really beneficial.

6) The **QC negative points** being applied to applicants to sell deals to a third party are onerous and illogical. As a group that has fervently tried to hold and preserve as much as we could, spending millions in the last few years out of pocket on older 15-20-year-old deals, it just feels sp wrong. We simply do not have the ability to keep all of this aging housing product and maintain it at the level we feel is needed to avoid being substandard by our standards! And we can't resyndicate it all; a lot of these sites simply don't score anymore. Any deal we have sold was sold after either trying to get it funded through resyndication, funding it out of pocket to the tune of hundreds of thousands of dollars, and/or petitioning the Authority for relief via raised income limits. They've been sold to legitimate third-party buyers, people we dont know, and we have zero control over what they do now. We don't even know if they are all being submitted for QC? Hopefully not, but Kim confirmed some that I was afraid might be at the April housing conference. It was the first time I heard it for sure about those. The deals she told me were in for QC we had first attempted to obtain vouchers for from the local HA to increase our income and leverage to fix HVACs/stairwells/siding/elevator replacement/etc. That door did not open. We then notified the local non-profit about the upcoming possibility of a sale months before they went live on the market so they had ample time to get their finances in order to possibly purchase, thinking they could abate taxes and make it work. No bites or offers. We truly tried then and are still trying, so reading that line in the QAP draft struck a nerve. Pls give us tools and resources for preservation, not penalties!

And what about forced sale language? We have that in some deals with toothier old LPs, and we always fight it, but one day we may lose that fight. How do we control the sale/buyer?

Another consideration- I am a non-controlling minority partner in deals with my 76-year-old retired father. Others are surely in similar situations as non-controlling members of old deals (bc, to get experience, that's often how you got into the business). Related party or not, I can't control or dictate all that he does, just as junior partners in older deals can't control what the controlling GP does, or as many GPs can't control what the LP does if it's one of those toothy LPs.

I just do not see the legitimacy or the fairness of the 2nd bullet in item C3 on page C1-8.
I think the negative points for submitting a QC on an older deal that doesn't have a viable path forward are generally wrong, even if it's the original owner of the deal, but tying it to the actions of a subsequent owner is next level.

Other states are allowing higher income limits for deals that are out of compliance, or have loan programs for preservation, etc. There is a HUGE shortage of missing-middle housing in this state. If we don't want deals leaving the program, and we don't want LIHTC housing to become blighted or slummy, we have to look at this as an alternative. Housing at 70-100% AMI is still workforce housing, and we need it in SC. LIHTC used to be workforce, and now it encompasses much deeper targeting bc it's the most successful housing program ever, so we expect it to accommodate every lower-income strata and address so many social ills...its not really workforce housing anymore. Maybe the older deals can become the new workforce housing. There just has to be another way to address the problem you're trying to solve.

7) **Public transportation-** agree with the comments made that any kind of public transit is a good thing. Maybe have a range of credits for public transit similar to site amenities, but tied to service frequency and/or proximity to the site (e.g., the current definition counts as 3 points; less frequent/further away is worth fewer points).

8) **Waiver requests-** definitely those granted, but ideally those requested-- should be published for the benefit of everyone. Comments and questions were previously partially redacted and published on the Authority's website. I think this would be a good practice to reinstate.

9) With the supportive housing points in play, I think a demonstrated, committed **partnership with legitimate social services coordinators** as a point item would be prudent and a legit additional point item, even if it's only 1 point.

10) Point(s) for proximity to places like Head Start, boys and girls club, or other community advocacy centers, food banks, job training centers, or similar would be a possible point of consideration. This thought actually came from one of our regional managers today after the session, and I thought it was a good one to share.

Thank you for considering this feedback and your work administering this vital program.

Respectfully,
Holly Douglas Schaumber

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