Outlook

[External] QAP comments 4, 2027 draft

From Holly Douglas [redacted]
Date Wed 8/19/2026 11:40 AM
To Taxcreditquestions <taxcreditquestions@schousing.com>

Good afternoon,

Apologies for sending comments in multiple rounds. Since a revised draft has not yet been posted and we have begun actively evaluating sites, additional questions and concerns continue to arise. Thank you in advance for your consideration of the following additional comments regarding the 2027 draft:

Rehabilitation Pool

If preservation is truly a meaningful priority for the Authority, which I know it is, I respectfully suggest allocating additional credits to the rehabilitation pool. As currently structured, the number of available credits does not seem sufficient to meaningfully advance that objective. It is cheaper to preserve existing units and bring them to like-new condition than it is to build new. Both are important, but it does not feel they are equally weighted at present. Simply keeping aging units in the program without an outlet/means to bring them up to current quality standards is not enough...

Basis Boost for rehabs- Please consider applying the boost to rehab applications regardless of whether or not they exist within a QCT or DDA.

Backup Amenities for Site Scoring

For many years and across multiple application cycles, SC Housing permitted applicants to identify backup amenities for site-scoring purposes. This provided a reasonable safeguard in the event there was a disagreement regarding whether a particular amenity qualified, or if a business closed, relocated, or changed tenancy during the application and evaluation period.

I respectfully request that the Authority consider reinstating the ability to identify a voluntary backup amenity. Doing so could reduce disputes between applicants and the Authority, address unforeseen changes in amenity status during the application cycle, and potentially reduce requests for advance determinations before applications are submitted.

I recognize that evaluating additional amenities creates some additional administrative burden for the Authority. However, if the proposed two-point penalty remains in place, that would seem to provide a meaningful deterrent against applicants simply submitting numerous questionable amenities in hopes that one will qualify.

Definition of "General Merchandise Establishment"

Please provide additional guidance regarding what qualifies as a "general merchandise establishment" within the retail category. The term seems somewhat open to interpretation. I assume that

establishments selling a broad variety of goods—such as traditional general stores, five-and-dime stores, or hardware stores—could qualify.

I recognize that this terminology has appeared in the QAP for several years. However, I have heard that Mast General Store was determined not to qualify in a prior round(?). If that is accurate, additional clarification would be helpful, as a traditional general store would appear, on its face, to fit within the ordinary meaning of an establishment selling "general merchandise.

Shopping Amenity Definition and Urban Sites

Regarding the shopping definition- Requiring stores to sell "affordable" goods, carry specific basic clothing items—including underwear for all members of a household—and affordable houseware—and fall within the applicable 0.3-mile radius (if not a strip center or big box center), while also excluding stores such as Dollar General or Dollar Tree from satisfying the clothing component, creates a very narrow standard.

As a practical matter, this definition appears likely to eliminate the shopping amenity for many otherwise highly walkable downtown and urban-core locations. Those areas often have substantial retail activity, but their retail mix is fundamentally different from suburban commercial corridors where big-box stores and strip centers are typically located.

The proposed definition also seems somewhat disconnected from current consumer behavior. Many of the basic household and clothing items contemplated by this category can now be purchased online, often at lower cost, and delivered directly to residents through retailers such as Amazon and Walmart. Depending on the order, delivery is frequently available at little or no additional cost, and same-day delivery is increasingly common throughout the state. We have been incorporating package rooms into our communities for more than five years precisely because residents are routinely purchasing these types of everyday items online.

At the same time, when online purchasing is not the most affordable or practical option, many residents obtain basics such as socks and underwear from stores like Dollar General, or purchase furniture and other household goods from organizations such as Miracle Hill or Goodwill. The draft appears to exclude some of these very stores from qualifying, which creates a tension between the stated goal of ensuring access to affordable goods and the types of establishments that are actually permitted to satisfy the requirement.

If the Authority's policy objective is specifically to prioritize developments located near big-box retail centers that provide a broad range of inexpensive household goods, then the proposed definition serves that purpose. If, however, the broader intent is to reward meaningful access to shopping and daily necessities, I respectfully suggest that the definition may be unnecessarily restrictive and could inadvertently disadvantage otherwise desirable urban and downtown sites.

Final application deadline

I don't think I'm the only parent in the mix who feels like the month of May, and especially the last week of grade school before Memorial Day, is a complete fire drill...but having full apps due during that same week is a lot for many. This is based on casual conversations with peers the last few years and my own experience. If we could move the deadline up a week or two from the end of school/Memorial Day, it would be sweet...I'm pretty sure the majority of SC public schools get out right before Memorial Day now. Even if we try to work ahead, our third-party vendors know the submission deadline and often back into it for getting reports turned in.

Thank you again for considering these comments as the 2027 QAP continues to develop.

Kindly,

Holly Douglas

Holliday Development