Thank you for this opportunity to provide input on the 2027 QAP.

- We support the increased driving score points to 76. It will help differentiate applications and avoid tiebreakers.

- We support the additional 1 point for a grocery store within .5 mile. This will help differentiate sites and avoid tiebreakers. It is also a direct benefit to the future residents who will have better access to full-service grocery stores.

- Please clarify in writing that the additional point for the grocery store would make the maximum driving score 77.

- We appreciate the clarifications on what a is required for a grocery store amenity to qualify for scoring.

- We believe the description of the "Shopping" amenity still needs additional clarity. Adding the language "a big box store, or dollar store" would help clarify that dollar stores are intended to meet the definition, with the exception of Dollar Tree which is specifically ruled out.

- We support the radius for jobs moving to a 1-mile radius. This will help differentiate sites and avoid tiebreakers, as well as place new LIHTC in areas of upward mobility with employment opportunities.

- We support the additional tier of 7 points for $12,000 per unit leveraging. This helps incentivize bringing more financial resources to LIHTC development, stretching existing resources further increasing production of affordable housing. It also incentivizes developers to develop relationships with municipalities and counties for additional funds and encourages local communities to support affordable housing with their own local dollars.

- NHE is supportive of the comments from the QAP call held on September 21st regarding the increase in Federal Award limits. As projects become increasingly difficult to syndicate, more credits would help offset losses in equity proceeds from lower syndication prices. Federal Award limits should be increased. Suggested limits: $1,600,000 – Urban; $1,500,000 – Suburban; $1,400,000 – Rural; PHA – Maximum Amount Determined by Subject County

- Regarding the comments during the QAP call held on September 21st point scoring criteria tied to the amount of State Tax Credits requested: we agree that the QAP

should ***not*** assign any points associated with the amount of the State Tax Credits requested. If the point system were designed to reward requesting lower amounts of State Tax Credits, this would encourage developers to try to underwrite project as "skinny" as possible in order to maximize their point scores, which in turn would likely lead to issues with financial feasibility after allocations are made. NHE believes that SC Housing should keep the State Tax Credit request language as currently written in the QAP. It is up to each development team to determine whether they should request State Tax Credits for their application, and the developer will need to make a business decision based on their application's scoring position coupled with the potential availability of State Tax Credits when awards are determined.

- NHE supports the comments during the QAP call held on September 21st regarding the need to revise the Qualified Contract language as currently written in the 2027 QAP draft. Developers should not be expected to answer for another party's future actions following the sale of property. SC Housing has every right to hold developers accountable for their direct actions such as requesting a qualified contract. That is a decision that the developer is making under its direct control. However, it would be extremely difficult for a developer to know a purchaser's intentions for a period of five (5) years following a transaction. Additionally, there could be a situation where both parties (buyer and seller) have the best of intentions during a sale transaction and for circumstances to change where the purchaser of a property decides to request a qualified contract 4 years from the purchase date. In that scenario, it would be unfair to punish the original developer for the actions of a third party over which they have no control on a property where they no longer have active involvement.

- Appendix C-1: Section III (G) – SC Housing should require an Attorney Opinion letter at the time of application attesting to the applicability of other credits for applications requesting 5 points under the "Other Credits" section. These other tax credits often require detailed knowledge of state tax law, and the application and qualification process.