

Wilbourne, Kim 9083

From: Britni Grimes [REDACTED]
Sent: Friday, May 15, 2026 3:43 PM
To: Taxcreditquestions
Subject: [External] Tapestry Development Group Comments for 2027 QAP

Please see the comments from Tapestry Development Group below. Thank you for your consideration.

SC Housing 2027 QAP Comments

Appendix C-1

- Allow for non-profits to state their intent to apply as a non-profit at the Preliminary Application.
- Clarify the tiebreaker criteria which is used if the Authority adjusts awards to allow up to approximately ten percent (10%) of the state's federal tax credit ceiling being awarded to such projects. For example, will the Authority use the general tiebreaker criteria to determine which non-profit application to choose or will it consider the geographic location or prioritize one of the set-asides (high-demand new construction, rehabilitation, general new construction, and / or public housing authority).
- Area Employment – please consider using a percentage of jobs in an area rather than the number of jobs. For rural areas, all of their jobs may meet the income criteria but they may still have less than 1,000 jobs available. Consider the following:

Applications will earn points as follows:

- 10 points for 90-100% jobs.
 - 8 points for 80-89.99% jobs.
 - 6 points for 70-79.99% jobs.
 - 4 points for 60-69.99% jobs.
 - 2 points for 50-59.99% jobs.
- Eliminate points for USDA Rural areas. With the addition of the Suburban pool, there are now metrics in place to ensure that truly rural sites receive credits. The current scoring in the Suburban pool encourages site development on the rural outskirts of mid-size cities and towns rather than closer to the core which tends to also have improved access to amenities, would encourage infill development, and would better utilize existing infrastructure

Appendix C-2 and C-3

- Please consider working with the Joint Bond Review Committee to revise the ranking determination for the highest value and greatest public benefit. While it is evident that the intent of the ranking criteria is to ensure that state resources are stretched to their full extent, there is an unintended consequence of the ranking criteria placing a low priority on senior housing. Due to the lower number of bedrooms and therefore the lower overall square footage and lower potential tenants, senior developments do not score well in the 4% application though SC's senior population, like that of the Country's, continues to grow. If there is no flexibility in the actual ranking determination, please consider allocating a percentage of the 4% bond awards to senior housing such that those projects are scored against like projects and SC can continue to provide senior housing.
- With the addition of the 25% test, there is an opportunity to consider opening up a non-competitive round of 4% credits after the SC STC which are reserved for 4% competitive deals are allocated. This

will allow SC to stretch its bond capacity further when developers are able to make deals work without SC STC while ensuring that the SC STC is fully committed.

General

- In the future, please consider extending the following year's initial QAP Comment period until at least 1 week after the current year's application deadline.

Thanks,

Britni Grimes

Regional Development Director

Tapestry Development Group, Inc.



www.tapestrydevelopment.org

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