



Outlook

RE: [External] Eureka Mills - Noise Waiver

From Wilbourne, Kim 6-9083 <kim.wilbourne@schousing.com>

Date Mon 5/12/2025 4:17 PM

To Thompson Gooding <tgooding@parkterracecompanies.com>; Travis Ismir <tismir@parkterracecompanies.com>

Cc Andrew M. Cope <ACope@jmcope.com>; Alex Walker <awalker@dkp.org>

External (kim.wilbourne@schousing.com)

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Thompson,

At this point in the process. I would recommend following the language in the QAP –

- a. Sites where a nearby active railroad causes excessive noise and vibration. The application should include a map showing the distance to any railroad tracks within 1,000 feet. Demonstrating an acceptable noise level, as defined by HUD, can be the basis for waiver.

SC Housing will require the development meet an acceptable noise level as defined by HUD.

Kim

From: Thompson Gooding <tgooding@parkterracecompanies.com>

Sent: Monday, May 12, 2025 4:03 PM

To: Wilbourne, Kim 6-9083 <kim.wilbourne@schousing.com>; Travis Ismir <tismir@parkterracecompanies.com>

Cc: Andrew M. Cope <ACope@jmcope.com>; Alex Walker <awalker@dkp.org>

Subject: RE: [External] Eureka Mills - Noise Waiver

Kim,

Just wanted to follow up and get your thoughts on this and whether shifting the property line would help address any potential concerns.

Thanks,
Thompson

Thompson Gooding
Park Terrace Companies
(229) 251-6399

From: Thompson Gooding
Sent: Thursday, May 1, 2025 2:04 PM
To: Wilbourne, Kim 6-9083 <kim.wilbourne@schousing.com>; Travis Ismir <tismir@parkterracecompanies.com>
Cc: Andrew M. Cope <ACope@jmcupe.com>; Alex Walker <awalker@dkp.org>
Subject: RE: Eureka Mills - Noise Waiver

Kim,

Thanks for your consideration on this. I'd like to apologize, as I think the subject line here may have caused some confusion. To be clear, we are not seeking a waiver. We are simply attempting to confirm that based on the language of the QAP, a waiver should not be required in the first place.

The QAP states that "The Authority may disqualify new construction applications based on the following:", then goes on to include "Sites where a nearby active railroad causes excessive noise and vibration." The QAP does not give any minimum distance to the railroad, but does request a map showing any railroad lines with 1,000' for reference. Again, this is not a stated minimum distance to the tracks, but a requirement for the reference map. Heavily-used rail lines could have excessive noise at more than 1,000', and less-used lines such as this may not have excessive noise at distances far less than 1,000'. We are proposing to place our buildings and any amenities far enough away from the railroad that there will not be "excessive noise or vibration".

We have based our plan on the standard assessment method for noise, which is HUD guidance. HUD guidance, specifically in 24 CFR 51.103(c)(1), states that noise "standards shall usually apply at a location 2 meters (6.5 feet) from the building housing noise sensitive activities in the direction of the predominant noise source." Therefore, if we place our buildings at least 6.5 feet past the 65dB noise contour, there will not be excessive noise and vibration and a waiver will not be required.

Although HUD noise requirements are referenced as potential justification for a waiver, this would be applicable if there was excessive noise that had to be mitigated to acceptable levels according to HUD requirements. Our position is that we do not have excessive noise in the first place.

Additionally, if SC Housing takes a stricter position than HUD standards and chooses to assess the noise at the property line, we are happy to subdivide the noise-affected area out into a separate parcel. This would move the property boundaries, but would not change the fact that we already do not have excessive noise or vibration at the buildings.

Thanks,
Thompson

Thompson Gooding
Park Terrace Companies
(229) 251-6399

From: Wilbourne, Kim 6-9083 <kim.wilbourne@schousing.com>
Sent: Thursday, May 1, 2025 12:21 PM
To: Travis Ismir <tismir@parkterracecompanies.com>
Cc: Andrew M. Cope <ACope@jmcope.com>; Alex Walker <awalker@dkp.org>; Thompson Gooding <tgooding@parkterracecompanies.com>
Subject: RE: Eureka Mills - Noise Waiver

Travis,

Waiver request for mandatory site requirements were due January 14, 2025. Please see the 2025 Anticipated 9% Tax Credit Program Schedule posted on our website.

Thanks,
Kim

From: Travis Ismir <tismir@parkterracecompanies.com>
Sent: Tuesday, April 22, 2025 3:37 PM
To: Wilbourne, Kim 6-9083 <kim.wilbourne@schousing.com>
Cc: Andrew M. Cope <ACope@jmcope.com>; Alex Walker <awalker@dkp.org>; Thompson Gooding <tgooding@parkterracecompanies.com>
Subject: [External] Eureka Mills - Noise Waiver

Good afternoon, Kim.

We are working on a planned 60-unit 9% development to be located on a former mill site in Chester. The QAP requires projects to identify any railroad tracks within 1,000 feet. The property is located within 1000' feet of a railway, however, all buildings and amenities will be located where the noise levels fall under the unacceptable noise level, as determined by HUD.

Please allow this email to serve as our request that this development be allowed to proceed on the basis that the residential buildings, clubhouse, and amenities will be located where noise levels fall within the acceptable noise range, as determined by HUD.

Thank you,

Travis Ismir

Director of Development

Park Terrace Development

www.parkterracecompanies.com

(407) 949-7780

