

2024 Annual Action Plan

HOME & NHTF Public Comments & Responses

2/28/2024

- 1. Comment:** Can we provide bank statements showing the required net worth and liquidity in lieu of audited financials? If audited financials are required, can the financials be supplemented later in the application process as they may take a few months to complete for our organization?

Response: No, bank statements are not acceptable when submitting the Intent to Apply Application. All applicants must provide audited, reviewed, or compiled financial statements dated on or after December 31, 2022. Applicants that do not have financial statements prepared in accordance with the requirements in the SRDP Application Manual may request a waiver to submit the financial statements with the Full Application instead; however, the purpose of the Intent to Apply Application is to pre-determine if an Applicant meets experience and financial capacity requirements prior to incurring the expenses necessary to prepare the Full Application. Applicants that elect to request a waiver will have to pursue completing the Full Application without this determination at their own risk.

- 2. Comment:** Can a construction company receive a waiver on the 5 years of experience requirement to qualify as an identity of interest contractor? Our company only has 4 years of experience.

Response: A waiver can be requested and determinations will be made based on the experience and organizational capacity of the contractor.

- 3. Comment:** Is there a limit as to how close in proximity a proposed 2024 SRDP project can be to a previously funded SRDP project?

Response: No, not in proximity to a project funded in a previous SRDP application cycle. Be advised, however, per page 9 of the SRDP Application Manual, proposing two separate projects in the same application year for the same target population using any SC Housing funding source where the projects will be located adjacent to, in proximity to, or directly across the street from each other is prohibited.

- 4. Comment:** If our proposed property is located close to a new commercial development that is not yet open for business, but should have a similar timeline for development, can we include this coming retail development in our amenities list for purposes of scoring?

Response: No, the amenity has to be open for business as of the deadline the Full Application is submitted to receive points.

- 5. Comment:** Can a project receive an exception and approval in the application process if sewer is not currently available at the site, but plans are in place to install and complete availability prior to the completion of SRDP construction /or completion of site work?

Response: No, water and sewer utility tie-ins must be accessible to the site at the time of the Full Application submission.

6. **Comment:** Can a property with more than 20% wetlands be allowed provided the project has fill permits and development mitigation plans in place?

Response: No, due to federal environmental regulations, SRDP projects cannot adversely impact a wetland.

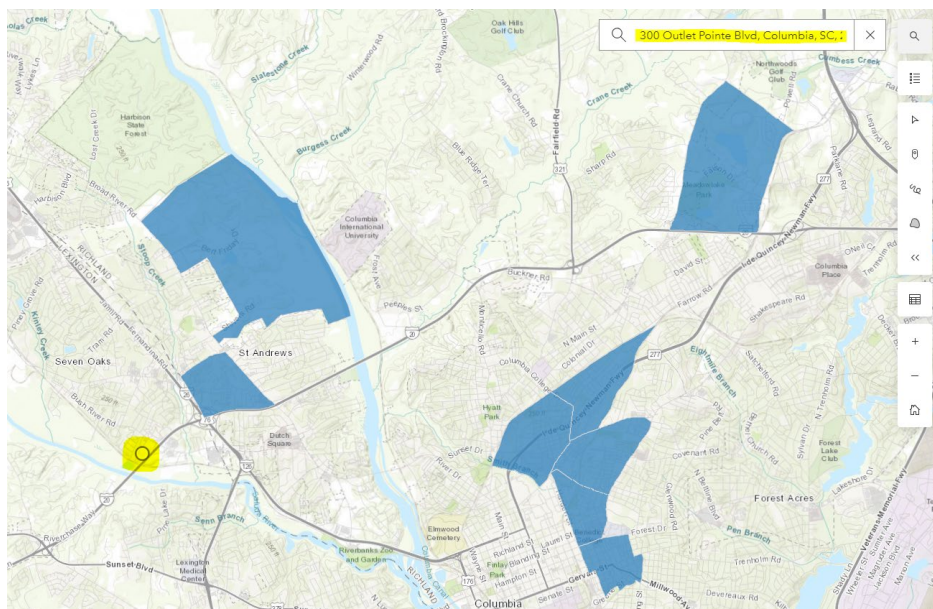
7. **Comment:** Page 29, #3 Site and Neighborhood Standards: Is this section only applicable for proposed projects that are increasing the number of units for an existing development? For example: none of our proposed projects are located in a racially/ethnically concentrated area according to the R/ECAPs link, but a handful of them fall under this minority concentrated location. Do we still receive the points for not being in a racially/ethnically concentrated area of poverty?

Response: Site and Neighborhood Standard regulatory requirements located at 24 CFR 983.57(e)(3) apply to all new construction projects and rehabilitation projects that increase the number of units. Projects not located in an area of minority concentration qualify for 5 Points. In addition, projects that are not located in a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as defined by HUD qualify for 5 points. If the project has scattered sites, all of the sites need to meet the scoring criteria to qualify for the points for these two categories.

8. **Comment:** Page 25, #4, under Scoring Criteria: To determine if our proposed property is located in a racially/ethnically concentrated area of poverty, do we use only the R/ECAPs link provided?

Response: Yes, use the link provided and follow the directions provided below to determine if your project site(s) are located in R/ECAP areas. SC Housing will check for accuracy as well during the application review process.

*When searching address in the R/ECAP link, the proposed development address will be shown as a circle marking the address (see highlighted yellow circle and address in screenshot below). Unless the address is located in a racially/ethnically concentrated area of poverty designated by a blue highlighted area, the address is **not** in a concentrated area. If it is in a blue area the address **is** in a concentrated area.*



9. **Comment:** Threshold Requirements 4b. Over the last few years we have seen developers face difficulties with architects and contractors. Because of this we would like to see the metric for 50% construction complete be pushed back 90 days (July 1, 2024).

Response: Meeting programmatic benchmarks as defined in the SRDP written agreements is crucial for the state to meet federal commitment, expenditure and project completion deadlines. Due to these regulatory requirements and the consequence of losing funding when deadlines are not met, SC Housing will keep the completion requirement for 2021 projects at April 1, 2024; however, it will reduce the percentage complete from 50% to 25%.

10. **Comment:** We respectfully suggest several possible updates to the language in the “SRDP Exhibit 7” to create more flexibility for previous SRDP awardees to utilize their past SRDP experience in future application cycles:

Page 21 – Draft SRDP Manual – Section 4:

In order to be eligible to participate in the 2024 SRDP application cycle, previous HOME and NHTF awardees and their principals must have met the below deadlines. An SRDP Application Exhibit 7 – Previous Participation Certification, must be submitted with the Intent to Apply Packet.

a. All 2020 and prior projects must have passed their SC Housing final inspection on or before April 1, 2024.

b. All 2021 projects must have ~~50~~-25% construction completed on or before April 1, 2024, or started framing/vertical construction as evidenced by a completed SC Housing inspection.

c. 2022 projects must have started vertical construction as of April 1, 2024, as evidenced by a completed SC Housing inspection.

We would also support adding the language: The project year will be based on the year in which application scoring and review is completed and initial conditional commitments are made, not the year of initial application.

Response: SC Housing will revise the 50% construction completion deadline to the following: “All 2021 projects must have 25% construction completed on or before April 1, 2024 as evidenced by a completed SC Housing inspection.