

SC Housing
Public Comments and Responses
2025 Action Plan for the HOME Investment Partnerships Program (HOME) and the Housing
Trust Fund Program (HTF)
2025 Small Rental Development Program (SRDP)
Public Comment Period 12/30/2024 - 1/28/2025

Comment 1: Page 24 - Distance to Amenities - Allow developments in smaller counties (e.g. Group B Counties as listed in the 2025 QAP) to score points using greater distances (e.g. 2, 2.5, 3 and 3.5 miles).

Response 1: SC Housing is unable to take this comment into consideration without further explanation from the commenter regarding the reasoning for the comment or without referencing data to support the comment. No changes will be made to the scoring criteria for positive site characteristics.

Comment 2: With the increasing availability of receiving prescriptions via mail via CVS, Amazon, etc., consider decreasing or eliminating the points allotted for the Distance to Pharmacy line item.

Response 2: SC Housing agrees that many pharmacies offer prescription delivery services; however, many low-income citizens have limited access to the internet, computers, and smart phones to utilize this convenience. In addition, delivery service fees may add to the cost of medications and some individuals may not be not technically savvy or may be distrustful of sharing their personal, medical, and financial information electronically. For the reasons stated above, SC Housing will not be altering the positive site characteristics scoring for proximity to a Pharmacy.

Comment 3: Don't require a grocery to be part of a chain in order to be considered a full-service grocery.

Response 3: SC Housing's requirement that a grocery store be a part of a chain to receive positive site amenity points is necessary to provide uniformity. Chain stores provide consistency with product availability and variety, and hours of operation that may not be possible to presume with independently owned grocery businesses.

Comment 4: Page 25 - Employment Opportunities - For this scoring criteria, Jasper County should be measured using a 4-mile radius rather than 2 miles.

Response 4: SC Housing is unable to take this comment into consideration without further explanation from the commenter regarding the reasoning for the comment or without referencing data to support the comment. No changes will be made to the scoring criteria for employment opportunities.

Comment 5: Page 26 – Leveraging - Is a prospective development on land donated by a local government eligible for points under paragraph 1 (% of development cost funded by a source other than SC Housing and 2 (documented financial support from a city, county or other local government)? If not, please consider allocating points as such.

Response 5: Land donated by a local government would qualify for leveraging points under both items #1 and #3.

Comment 6: Most Housing Trust Funds provide assistance in the form of soft, low to no-interest loans in order to recycle their funding. Please allow low to no interest rate loans to be considered as a funding source other than SC Housing for purposes of determining points scored in Leveraging paragraph 1.

Response 6: Per page 12 of the 2025 SRDP Application Manual under the SC HTF Fund heading:

1. "Funds will be awarded as either a twenty (20) or thirty (30) year repayable loan, forgivable loan or a combination of both.
2. "Repayable loans will be amortizing with an interest rate of zero percent (0%) to five percent (5%) for a minimum term and amortization period of twenty (20) years or a period that does not exceed thirty (30) years."

Comment 7: Hi, I am an affordable housing developer looking at the small dev program for a historic building. The ineligible criteria include new construction projects within 300 ft of a rail road track. Is this also true for adaptive reuse? We are looking at a building that could get 3 historic tax credits....leverage for Small Dev funds would be unbeatable.

Response 7: This requirement is not applicable to rehabilitation or adaptive reuse projects; however, if pursuing such a project it is recommended that you evaluate the results of a noise study conducted at the proposed site that meets the requirements described in the 2025 SRDP Application Manual regarding noise decibel requirements on page 11, item # 19. Project sites with exterior noise levels of 75 decibels or higher are not eligible for funding.

Comment 8: Hello! I hope this email finds you doing well. My partners and I have a couple of questions regarding the Small Rental Development Program. If we propose more than 39 units for the entire project, is it possible to still apply? As an example, we have a 45-unit project that we would propose that 39 of the units be targeted for SRDP and the remaining units as market rate. Is this allowable?

Response 8: The 2025 SRDP program does not allow for the inclusion of market rate units in the project; however, SC Housing may consider a waiver request to allow more than 39 affordable units in rehabilitation projects, subject to the project meeting and all other SRDP requirements.

Comment 9: Can there be a traditional perm loan along with the SRDP funds?

Response 9: The 2025 SRDP program prohibits the inclusion of traditional/conventional permanent loans; however, Applicants may submit a waiver request to be excluded from this requirement if the development will not be financially feasible without conventional financing.

Comment 10: Does the program allow waivers? And if so, when should they be submitted?

Response 10: Applicants with waiver requests should submit them to the CommunityDevelopmentPrograms@schousing.com email as soon as they are aware the request is necessary. All waiver requests must be in writing and be accompanied by supporting documentation.