

APPENDIX C: REHABILITATION GUIDELINES

National Housing Trust Fund, HOME Investment Partnerships Program, Home ARP, and SC Housing Trust Fund Awarded Developments

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Applicable Forms Fannie Mae (FM) Forms:

1. FM-Instructions for Performing a Multifamily Property Condition Assessment (PCA) Form 4099
2. FM-Appendix A Form 4099.A, Streamlined Property Condition Assessment Guidance.
3. FM-Appendix B Form 4099.B, Pre-Site Visit Questionnaire for Property Condition Assessment.
4. FM-Appendix C Form 4099.C, Structural Risk Evaluation Questionnaire.
5. FM-Appendix D Form 4099.D, Guidance on Preparing PCA Report Schedules and Tables.
6. FM-Appendix E Form 4099.E, Fannie Mae PCA, Property Condition Assessment Data Supplement.
7. FM-Appendix F Form 4099.F, Estimated Useful Life Tables.
8. FM-Appendix G Form 4099.G, Known Problematic Building Materials and Property Design Issues.
9. FM-Appendix H Form 4099.H, Analysis Tool for a High-Performance Building Report.
10. FM-Appendix I Form 4099.I, Analysis Tool for a Technical Solar Assessment.

Applicable SC Housing Forms:

11. Appendix E SC Housing Rehabilitation Work Scope Form.

1. Introduction

These Rehabilitation Guidelines are designed to outline the requirements for the rehabilitation of rental housing developments assisted with financing from SC Housing administered HOME Investment Partnership Program, HOME ARP, National Housing Trust Fund Program, and the SC Housing Trust Fund Program. These guidelines apply to both single-family and multi-family developments. The goal of these Rehabilitation Guidelines is to standardize SC Housing's expectations for the longevity and marketability of completed rehabilitation of existing rental property. These guidelines are also intended to provide the owner/applicant with guidance and requirements for adhering to SC Housing's processes and procedures for the rehabilitation of affordable rental housing. The requirements mentioned in these guidelines meet the minimum NHTF requirements, as outlined in the HUD requirements for NHTF Rehabilitation standards, additional information can also be found in the appendices of this document.

In accordance with federal requirements established by 24 CFR 92.25 (HOME), and 24 CFR 91 and 93, the National Housing Trust Fund (NHTF), the South Carolina State Housing Finance and Development Authority (SC Housing) has established these Architectural Standards. All projects receiving SC Housing resources for the rehabilitation of existing rental housing, utilizing funding from the South Carolina Housing Trust Fund (SCHTF), HOME Program, Home ARP Program and/or, the National Housing Trust Fund Program (NHTF), must meet these Architectural Standards. It is the responsibility of the applicant/owner to ensure compliance with 100% of the requirements as described in these guidelines and SC Housing's mandatory design criteria are met, unless a waiver has been approved by SC Housing in writing.

The Fannie Mae Expected Useful Life Tables are to be used as guide to determine the components and systems that need to be replaced in order to meet the duration of all awarded program obligations. The use of National Housing Trust Fund dollars requires that projects funded under this program meet applicable Federal, State, and local statutory and regulatory requirements for a period of thirty years. These architectural standards are not meant to replace Federal, State or local codes. These standards shall be in addition to the following that are applicable to all properties funded in the program.

Nothing in this Appendix shall be construed to modify or eliminate any legally imposed requirement, including those governing accessibility.

Construction/ Rehabilitation must be in compliance with:

1. 2021 International Residential Code with South Carolina Building Code Council Modifications (SCBCCM) or currently adopted code year.
2. 2021 International Building Code with SCBCCM or currently adopted code year.
3. 2021 International Mechanical Code with SCBCCM or currently adopted code year.
4. 2021 International Plumbing Code with SCBCCM or currently adopted code year.
5. 2021 International Fuel Gas Code with SCBCCM or currently adopted code year.
6. 2020 International Electrical Code with SCBCCM or currently adopted code year.
7. 2021 International Fire Code with SCBCCM or currently adopted code year.
8. 2021 International Energy Conservation Code unamended applies to all new construction single family and low-rise multifamily up to three stories. **New HUD Requirement. SC Housing will require third party certification that 2021 IECC (unamended) requirement have been meet.**
9. ASHRAE 90.1 – 2019 unamended applies to all new construction mid- or high-rise multifamily four plus stories. **New HUD Requirement. SC Housing will require third party certification that ASHRAE 90.1-2019 (unamended) requirement have been meet.**
10. 2009 International Energy Conservation Code with SCBCCM or currently adopted code year.
11. Current Adopted Edition of the NFPA Codes and Standards.
12. ANSI 117.1 – 2017 Edition.

13. Americans with Disability Act.
14. Fair Housing Act.
15. Section 504
16. HUD Housing Quality Standards (HQS)
17. HUD Minimum Property Standards (MPS)
18. HUD National Standards for Physical Inspection of Real Estate (NSPIRE)

Developments must meet all applicable federal, state and local accessibility standards as well as all SC Housing accessibility requirements. By some measures, SC Housing’s Development Design Criteria and accessibility requirements exceed the referenced state and federal requirements.

All new and rehabilitation construction work scopes must give consideration to the property marketability and residential quality of life which includes, but is not limited to, upgraded building exteriors and unit interiors, and improved site conditions and amenities. SC Housing may determine that projects which exceed customary and reasonable construction costs, even if they are within published per unit cost limits, represent a poor utilization of resources and may not meet threshold requirements.

The applicant/owner must notify SC Housing inspection staff of when the pre-construction conference will be scheduled. The pre-construction conference must be scheduled prior to the start of construction. Compliance requirements for all applicable federal and state requirements must be included on the meeting agenda.

An onsite OAC Meeting will be scheduled during the last week of each month. The SC Housing Construction Project Manager will be notified via email of monthly OAC meeting dates and times. SC Housing staff may not attend all onsite OAC meetings.

All work scopes must propose:

The length of the affordability or compliance period for HOME rehabilitation projects is 5, 10 or 15 years, depending on level of investment. The length of the affordability or compliance period for National Housing Trust Fund rehabilitation projects is 30 years. Projects that propose rehabilitation must present a scope of work that will position the property to meet the entire extent of its statutory obligations. The Fannie Mae Expected Useful Life Tables will be used as a guide to determine the components and systems that need to be replaced in order to meet the duration of all awarded program obligations. It is expected that all work scopes will propose:

- A. A minimum “dwelling unit” per unit hard cost budget of \$25,000.

Hard costs eligible for this requirement are limited only to improvements within the dwelling unit envelope (windows, entry doors, exterior siding, unit insulation and roofing improvements). No site improvements, common building systems, community building improvements, new construction for community buildings, maintenance facilities, other common use structures or interior and exterior amenities will count towards the per unit hard cost minimum calculation.
- B. A substantial gut rehabilitation (where applicable) where major systems are removed and replaced according to the Fannie Mae Expected Useful Life Table.
- C. The replacement of any component of the building or site with a Remaining Useful Life, according to Fannie Mae Expected Useful Life Table, of less than 15 years.
- D. Corrective action replacements for all deficiencies noted in the Physical Conditions Assessment.
- E. The replacement of existing exterior stairs, breezeways, and handrails that have no roof cover.

- F. Entire unit (all rooms and ceilings) including doors and trims must be repainted.
- G. Compliance with the South Carolina State Minimum Standard Codes and Life Safety Code regarding stairs, handrails, guardrails, smoke detectors, fire alarms, and unit fire separation (attic draft stops, fire separation, rated party walls and floor/ceiling components, and caulking of all penetrations in the fire assemblies).
- H. Substantially the same scope of work in all units.
- I. Compliance with SC Housing Appendix B Development Design Criteria, all current South Carolina building codes, SC Housing accessibility requirements, and UPCS, subject to inspection, upon completion of work.

SC Housing will review the type of construction and associated hard construction costs. Applications for the rehabilitation of a substandard property will not be funded if, in the opinion of SC Housing, the rehabilitation will not result in improved, safe and decent long-term housing, the proposed rehabilitation does not meet SC Housing standards, or if new construction would be more appropriate.

SC Housing may determine the need to perform its own Property Condition Assessment (PCA) or decline any application for rehabilitation if it is determined that the rehabilitation work scope:

- Is inadequate or excessive;
- Does not address the issues of the Physical Conditions Assessment;
- Does not address major structural issues, building codes, health, safety, marketing or any other conditions observed on the site;
- Will not result in safe, decent housing.

SC Housing may grant waivers to the Development Design Criteria if there is an overriding public policy need based on the physical conditions assessment, a certification from the architect and, where applicable, the appropriately-licensed engineer (civil, structural, mechanical, plumbing, electrical) documenting that the completed project will be viable and meet the SC Housing useful life requirements. All waiver requests must be submitted in writing and be accompanied by the SC Housing Rehabilitation Work Scope Form, Property Condition Assessment and any other substantiating documentation.

SC Housing may require, as a condition of the waiver, full funding of the capital replacement reserve. The capital replacement reserve must clearly schedule all component/system replacements required according to the **Fannie Mae Expected Useful Life Table**.

Owners may request waivers for some following requirements, if it can be documented that compliance will be cost prohibitive. The burden of proof is on the owner/applicant.

- Architectural Standards
- Central HVAC in a multi-floor building where it can be demonstrated that the existing central system is the most efficient and economical system for conditioning the indoor spaces
- Flat roofs
- Room and unit size, closet and cabinet/counter requirements, number of bathrooms only if documentation of the marketability of existing conditions is provided
- One-bedroom units where the bathroom is accessed through the bedroom
- The \$25,000 per unit minimum
- Threshold Section, Required Amenities: Additional Requirements and Amenities for senior projects that requires Fair Housing compliance on all units built BEFORE 1991 only if clear documentation of the burdensome cost to provide accessibility to all units is provided.

SC Housing may deny a waiver if the completed rehabilitation will not result in safe and decent housing that is equal to comparable housing in the marketplace. In no case will SC Housing waive:

- Federal, state or local building or accessibility laws or codes;
- State energy conservation codes;
- Health and safety requirements;
- Room layouts that do not meet design criteria standards requirements for
 - Bathrooms that open from areas of food preparation, or
 - A sole passageway to a habitable room or hall unless egress is provided according to applicable fire codes.

The application for funding shall include a PCA and comprehensive SC Housing Rehabilitation Work Scope Form outlined below. Rehabilitation projects selected for funding must submit all pre-construction due diligence documentation outlined in the Architectural Submittals Instructions, including a complete set of plans and specifications produced by an architect licensed in South Carolina. The SC Housing Rehabilitation Work Scope Form submitted at application may not be changed between application submission and Final Allocation without SC Housing's consent. All proposed work approved during the application process must be completed.

2. Physical Conditions Assessments

The PCA is required at time of application for all rehabilitation, adaptive reuse, and historic preservation properties applications. The PCA, including an on-site investigation, narrative report, and Fannie Mae forms, must be conducted by a Qualified Consultant, who meets the following experience requirements and qualifications:

- Independent from the Applicant/Owner/Developer and have the capacity to render a report in accordance with Rehabilitation Guidelines.
- Have no less than five (5) years of experience performing physical conditions assessments for affordable rental housing projects.
- Not be presently debarred, suspended, proposed for debarment or suspension, declared ineligible or excluded from participation by any state or federal department, agency, or program.
- Agrees to comply with all applicable laws, including, but not, limited to federal, state and local laws, codes, regulations, ordinances, rules and orders, including all laws concerning fair housing and equal opportunity that protect individuals and groups familial status, or sex.
- Agree to comply with the SC Illegal Immigration Reform Act requirements of Title 8, Chapter 14 of the SC Code Annotated, and any other applicable state or federal immigration laws. Consultant must be registered with and using E-Verify.
- Consultant must comply with Drug Free Workplace requirements.

Developers must contact the qualified consultant directly and contract to provide the PCA services. The report must include a certification that the report was prepared by an individual who meets the above-listed experience requirements and qualifications to be considered a qualified consultant.

The PCA must be no more than six (6) months old at the time the Application is submitted. The report must include a signed statement from the consultant with the following language inserted in the consultant's signature block:

“The investigation has been completed in accordance with SC Housing requirements, is accurate, and can be relied upon by SC Housing as a true evaluation of the existing property conditions.”

SC Housing may verify all information contained in the report with an on-site inspection of the property conducted during the application process.

The Consultant shall inspect 100% of the units, community/common areas, maintenance spaces and the entire grounds of the property.

The report is not expected to identify regular maintenance items that are part of the property owner's operating responsibility such as occasional window glazing replacement and/or caulking, minor plumbing repairs, annual HVAC and appliance servicing. However, the consultant must comment on such items if they do not appear to be routinely addressed or in need of immediate repair, as well as report any observed or documented building code violations.

The PCA must include descriptions of the condition of the following items and identification of the Remaining Useful Life in the Fannie Mae forms format of the following items:

SITE SYSTEMS AND CONDITIONS

- Landscaping
- Irrigation
- Grading/storm water drainage
- Lighting - building mounted
- Lighting - pole mounted
- Parking
- Pedestrian paving (sidewalks)
- Utilities (piping & equipment such as pumps etc.)
 - Water
 - Fire
 - Gas
 - Electrical
 - Sanitary
 - Storm water drainage structures & piping
 - Cable/Phone/Communications
- Mailboxes
- Property sign
- Traffic signage
- Retaining walls
- Fencing
- Exterior stairs
- Exterior railings
- Site amenities

COMMON AREAS/COMMUNITY BUILDING

- Common area amenities
- Common area doors
 - Interior
 - Exterior
- Common area floors
- Common area ceilings
- Common area walls
- Common area kitchens
 - Countertop
 - Cabinets

- Sink
- Appliances
- Common area HVAC
 - Ductwork
 - Equipment
- Common area/public bathrooms
 - Fixtures
 - Hot water heating
 - Water piping
 - Waste/vent piping
 - Bathroom accessories
- Sprinklers
- Electrical
 - Light fixtures
 - Outlets/switches
 - Wiring
 - Equipment (panels/breakers)
- Life safety
 - Smoke alarms
 - Fire alarms

BUILDING ARCHITECTURE

- Foundations
- Crawl Spaces/Basements
- Framing
 - Wall
 - Floor
 - Ceiling/roof
- Exterior wall sheathing
- Exterior cladding
- Roof sheathing
- Roofing
- Gutters & downspouts
- Soffits
- Windows
- Insulation
 - Wall
 - Floor
 - Attic

DWELLING UNITS

- Cabinets
- Countertops
- Interior doors
- Exterior doors
- Floor underlayment
- Floor finishes
- Interior wall sheathing (gypsum wall board)

- Wall finishes
- Ceilings
- Bathroom vanities
- Bathtubs/showers
- Tub/shower surrounds
- HVAC
 - Ductwork
 - Equipment
 - Bath fans & ventilation
- Plumbing
 - Fixtures (faucets, shower valves, toilets, sinks)
 - hot water heating
 - water piping
 - waste/vent piping
 - Wall
 - Under slab
- Appliances
- Elevators
- Sprinklers
- Electrical
 - Light fixtures
 - Outlets/switches
 - Wiring
 - Equipment (panels/breakers)
- Life safety
 - Smoke alarms
 - Fire alarm system
 - Attic draft stop/fire walls

The PCA must also include a discussion of known building code violations and health/life safety violations

The PCA consultant is not expected to assume liability for compliance with accessibility regulations during design of post-rehabilitation. The consultant will identify any potentially costly barriers to the required property accessibility, i.e., changes in grade for accessible routes or parking and unit framing changes for required clearances. The PCA must identify major violations of The Americans with Disabilities Act, The Fair Housing Act, and The Uniform Federal Accessibility Standards (UFAS).

The Capital Replacement Reserve study shall extend for 20 years with no capital replacements within the first five years (apart from regular maintenance and turnkey operations that are part of operation and management). The Capital Replacement Reserve shall reflect the condition of the property “As Improved” by the entire SC Housing Rehabilitation Work Scope proposed by the Owner, not just the needs identified by the Physical Conditions consultant.

Any item that is determined to have an Effective Remaining Life of less than 15 years must be replaced as part of the work scope. Applicants may request a waiver where major systems (roofing, HVAC equipment, windows, doors, etc.) have been replaced within the last 5 years. SC Housing may allow for replacement in the 15-year term if the cost is clearly documented in the Capital Replacement Reserve study. Replacement Reserves must exceed the SC Housing’s minimum contributions and the project underwriting shall propose full funding of the Reserve.

The applicant must provide adequate documentation substantiating any differences between the Effective Remaining Life as a calculated difference between Effective Useful Life and Age and the Evaluator's opinion of the remaining useful life. The report should emphasize all systems/components with no Effective Remaining Life and those with Effective Remaining Life less than SC Housing requirements, all deferred maintenance, and repairs or replacements involving significant expense or outside contracting.

The consultant must note any suspected environmental hazards. Confirmation of suspected environment-related hazards, such as mold, lead-based paint, or asbestos containing materials, must be addressed in a separate environmental engineer's report. It is recognized that the Expected Useful Life Tables represents one judgment of the expected life of the various components. The Tables provide a useful and consistent standard for all evaluators to use. The Tables avoid debate on what the appropriate expected life is and permit focus on the evaluator's judgment of the effective remaining life of the actual component.

3. SC Housing Rehabilitation Work Scope Form

The SC Housing Rehabilitation Work Scope form must address future property marketability, durability, and energy efficiency which will add to the residential quality of life.

The SC Housing Rehabilitation Work Scope Form must be compiled by the Applicant/Owner, Architect/ Engineer, and Construction Contractor in SC Housing's required format to include materials, quantities and unit costs.

The SC Housing Rehabilitation Work Scope Form shall be based on:

- Requirements for the replacement of components with an Effective Remaining Useful Life of less than 15 years, building code and health/safety violations, and immediate needs from the PCA;
- Requirements for the replacement of components in order to comply with SC Housing's Design Criteria Standards and Specific Systems Replacement Guidance;
- All applicable Threshold and Scoring upgrades as indicated in the SC Housing Application including amenities construction;
- All costs that will be incurred in bringing the property into compliance with federal, state, local, and SC Housing accessibility regulations;
- Remediation of all issues identified in the Phase I and II environmental reports and NEPA reviews.

SC Housing must be able to determine that all major issues identified in the PCA and Environmental Reports are addressed in the SC Housing Rehabilitation Work Scope form.

4. Specific Systems Replacement Guidance

Site Utilities

The SC Housing Rehabilitation Work Scope Form must contain a budget line item to investigate (including with remote imaging) and repair or replace all main utility lines on the property, regardless of age. If more than 50% identifies as failed, the entire line must be replaced. Owners must submit a copy of the sewer investigation to SC Housing with the final inspection documentation.

Site Utilities - Special Considerations: Polybutylene Piping

The consultant must investigate any polybutylene piping and provide an opinion on whether it should be repaired or replaced. In all cases the last 3'-0" of polybutylene hot water lines must be replaced with copper piping.

Landscaping/Storm Water Drainage/Erosion

All areas of washout, exposed dirt, dead trees and overgrown landscaping must be corrected. SC Housing may require, as a condition of funding, that a civil engineer be engaged to address the issue.

Site Improvements

Broken or un-useable amenities equipment, non-compliant site stairs and handrails, failed/deteriorated sidewalks, paving, and retaining walls must be corrected. Sidewalks and paving must meet the minimum UPCS and accessibility standards

Foundations

All cracking or settling of concrete foundations and masonry must be addressed. SC Housing may require, as a condition of funding, that a structural engineer be engaged to address the issue.

Crawlspaces

All crawlspaces must be investigated and assessed for the presence of mold, plumbing leaks, and deteriorating structures. All crawl spaces must meet minimum energy and fire code requirements.

Rough Carpentry

Deteriorated subfloor, wall sheathing, roof sheathing, and structural framing must be addressed and allowances for the quantity of this work must be substantiated.

EIFS & Stucco

EIFS (synthetic stucco) may not be repaired but must be replaced by a SC Housing approved material. Hard-coat stucco (cement stucco) must be replaced if more than 25% of the existing material has failed. SC Housing must approve any repair or replacement of hard-coat stucco.

Acoustical Isolation

The work must meet the Design Criteria Standards for acoustical isolation wherever party and exterior wall structures and ceiling and floor construction are exposed during the course of construction.

Drywall

The Work Scope must indicate the approximate percentage of drywall to be removed and replaced. Allowances must be substantiated.

HVAC

Heating, ventilating, and air conditioning systems must be replaced if they do not meet the applicable building codes, do not meet Threshold Section Building Sustainability, or do not have the required Effective Remaining Life. The duct system must be replaced if necessary to meet applicable codes and SC Housing required life expectancy. If ductwork is not replaced, it must be cleaned and sealed in accordance with the South Carolina State Minimum Standard Energy Code.

Plumbing

Plumbing components must be replaced if they do not meet the requirements of applicable building codes, do not meet Threshold Section Building Sustainability, do not have the required Effective Remaining Life, 50% of the plumbing system needs replacement, or if lead in water testing results exceeds regulated levels. Refer to Appendix B Development Design Criteria Section II, P, 16 for details.

Electrical

The existing electrical system must be upgraded to meet all applicable codes. If 50% of the system needs replacement, the entire system must be replaced, including all wiring.

Building Sustainability

Rehabilitation projects will meet the sustainability requirements outlined in the 2021 Small Rental Development Program Application Manual, regardless of local code enforcement.

Accessibility

All Work Scopes must meet applicable federal, state, local, and SC Housing requirements. SC Housing requires 5% of the units to be fully accessible, 100% of mobility units to have roll-in showers, and an additional 2% equipped for the hearing and sight impaired. SC Housing maintains the same accessibility standard for new construction and rehabilitation.

Fire and Life Safety

Through strict code compliance, the property design shall provide a safe environment for all tenants. Compliance with the Life Safety Code for new construction is required for the following regardless of local building authority enforcement: stairs, handrails, guardrails, smoke detectors, carbon monoxide detectors, fire alarms, and unit fire separation (attic draft stops, fire/smoke separations, rated party walls and floor/ceiling components, and caulking of all penetrations in the fire assemblies). Life Safety items that do not meet current codes will not be 'grandfathered' in. Adherence to the most recently adopted editions of the South Carolina State Codes is required. This includes but is not limited to:

- Smoke detectors must be hard-wired and located per code for all construction, either rehabilitation or new. SC Housing will not waive this requirement for rehabilitation proposals. Carbon Monoxide Detectors shall be in accordance with NFPA 101 Life Safety Code and NFPA 720.
- Fire alarms and sprinklers must meet fire department, state and local code requirements.
- Attics must be constructed or rebuilt to meet all current fire and life safety codes, regardless of the requirements of the local building authority. These include draft stop walls, and rated ceiling, floor, and wall assemblies.
- All through-penetrations of smoke walls, draft stops, and rated assemblies must meet current fire codes.
- Existing exterior wooden stair systems may not be repaired. Instead they must be replaced in their entirety with new galvanized steel (field painted) and or concrete stair systems.
- Projects shall comply with all disaster mitigation-related requirements of the latest editions of the applicable mandatory State Minimum Standards as adopted and amended by South Carolina, and with all local ordinances regarding disaster mitigation.

Life Safety items that do not meet current codes will not be 'grandfathered' in. SC Housing may allow an outcome at a standard lower than new construction requirements based on documentation from the authorized local code enforcement official(s).

5. Specific Square Footage Requirements

Developments that have units, by bedroom size, smaller than the following square footages are considered to be obsolete developments and are not eligible for funding:

<u>Bedrooms per Unit</u>	<u>Minimum Heated Sq. Ft. per Unit</u>
Studio	400
One	500
Two	700
Three	850
Four	1,000

6. Historic Rehabilitation

Applicants must follow the *Secretary of the Interior's Standards for Rehabilitation* (36 CFR Part 68) to rehabilitate the property's interior and exterior features and complete SC Housing's environmental requirements, including the testing and abatement of lead and asbestos. These exterior and interior guidelines can be found at <http://www.nps.gov/tps/standards/rehabilitation.htm>.

Summary

If a Preservation Professional, as defined in the Environmental Manual, determines that the proposed project has an adverse effect or is a contributing structure which is either listed in the National Register or is eligible for listing in the National Register (or a lot within such a listed or eligible district) and South Carolina State Historic Preservation Office (SHPO) has cleared the proposed activities to proceed, the general rehabilitation standards may not apply. However, SC Housing still requires that the completed rehabilitation results in housing that will meet the duration of all awarded program obligations.

The Applicant must submit to SC Housing a detailed scope of work that sets forth the proposed rehabilitation or new construction activity in accordance with recommended practices as set forth in *The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*

Review the Historical Significance of the Property

Applicants must review documentation on file with the National Register of Historic Places or local preservation commissions and supplemented with a physical investigation to identify which character defining features and spaces must be protected.

Reconstruction (demolition and replacement) of Historic Properties

Applicants must consult with a Preservation Professional to develop a set of historically compatible model replacement building plans and construction drawings (including elevations) in advance of any planned reconstruction activities, which must then be approved by the SHPO before beginning construction.

Any modifications of the historic rehabilitation work scope must be approved in writing by SC Housing in advance of the project start-up.