



July 7, 2021

Bonita Shropshire – Executive Director
South Carolina State Housing Finance and Development Authority
300-C Outlet Pointe Blvd.
Columbia, SC 29210

Via Email TaxCreditQuestions@schousing.com

Ms. Shropshire,

Thank you for creating a space for the developer community to discuss the context behind our comments at the South Carolina State Housing Finance and Development Authority for the 2021 Developers round table.

Now that we have had a chance to share our feedback, we wanted to follow up the with an updated letter that reflects the specific points that we addressed during the meeting.

Comments from Developer Roundtable Discussion

- Bedroom Size
 - QAP Mandate: The primary bedroom in each unit must be at least 170 square feet. All other bedrooms must be a minimum 120 square feet. The minimum bedroom square footage excludes the closet space.
 - ◆ Dominium Comment: We have undergone a standard design process to determine an optimal bedroom size that is large enough to accommodate the items standard to a bedroom while maintaining an efficient size. Dimensions at 13x11 (143 sq ft.) allow for a master sized bedroom that fits a queen-sized bed with bedside tables on either side, a dresser on the wall opposite the wall where the headboard of the queen bed is located, space to pass through between the queen bed and the dresser, as well a closet with a door that can fully swing out. Theoretically, that extra space can be used for something else, but it will come at the expense of closet space. The decreased bedroom size we are advocating for will open space for us to build walk-in closets, which is already part of our standard design.




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- Minimum Square Footage for Unit Types
 - QAP Mandate: All residential units must meet minimum unit size requirements. The square footage measurements below are for heated square feet only, measured interior wall to interior wall, and do not include exterior wall square footage. The area occupied by the stair case may only be counted once. Unheated areas such as patios, decks, porches, stoops, or storage rooms cannot be included.
 - Studio 500 square feet
 - 1 Bedroom 750 square feet
 - 2 Bedroom 850 square feet
 - 3 Bedroom 1,100 square feet
 - 4 Bedroom 1,250 square feet
 - ◆ Dominion Comment: The size requirements for the 2-bedroom and 3-bedroom units are very reasonable and they also do not differ much from our standard unit sizes for 2 and 3-bedroom units. In fact, our standard design actually allows for greater square footages in both our 2 bedroom and 3-bedroom units. That said, the standard size for a 1-bedroom unit seem quite large compared to the requirements for the 2 and 3-bedroom units.
- 4% program exhibit
 - Dominion Comment: Clearly delineate what in the QAP applies to 4% transactions and what applies to 9% transactions. While reading the QAP, experience developers can tell that the document is very 9% heavy. Due to that, it is sometimes difficult for 4% developers to understand what applies to specifically to 9% transactions, what specifically applies to 4% transactions, and where there is overlap. Creating a 4% exhibit would make for a more efficient process when analyzing the QAP

Thank you again for your time and the opportunity to submit topics. We look forward to reading the draft of the 2022 QAP and submitting comments for that as well. We appreciate your consideration and look forward to our continued engagement with the South Carolina State Housing Finance and Development Authority so we can work together to solve the growing affordable housing crisis in South Carolina.

DocuSigned by:


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Nick Andersen

Vice President and Project Partner

Dominium Development & Acquisitions
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