



November 10, 2020

South Carolina State Housing Finance and Development Authority
Attn: Kim Wilbourne, LIHTC Manager
300-C Outlet Pointe Blvd.
Columbia, SC 29210

RE: DRAFT SC 2021 QAP Comments

Dear Ms. Wilbourne,

In review of the draft SC 2021 QAP and based on experience, it is suggested the following Mandatory Site Requirements could be problematic and limit the development of affordable housing especially in urban areas and the low country:

- **The following detrimental characteristics will result in an application being disqualified:**

- ❖ Mandatory Site Requirement 2(d): Any site listed on or adjacent to a site listed on the National Priority List under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or that requires the execution of voluntary or involuntary cleanup agreements with Department of Health and Environmental Control or other third party organizations as noted in a Phase II environmental assessment report (unless fully completed). (NOTE: Appendix E, Page E-1, Item C)

CONCERN: A VCC Agreement requires a developer to establish a site management plan based on the needs of the specific development. The VCC Agreement is finalized simultaneously when a developer takes title of the real estate. Therefore, the Authority should consider not disqualifying VCC sites or those adjacent to as long as the developer fulfills the requirements of Environmental Site Assessment as seen in Appendix E, Page E-1, Item C.

- ❖ Mandatory Site Requirement 2(e): If improvements would be located within 50 feet of either a FEMA-designated 100 or 500-year flood zone, or a wetland as defined under the Clean Water Act.

CONCERN: This will disqualify many sites suitable for affordable housing in the low country. It is suggested that this requirement not be applicable to the following counties: Beaufort, Berkeley, Charleston, Colleton, Dorchester, Georgetown, Horry and Jasper.

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- **The Authority may disqualify new construction applications based on the following. Distances indicated are the shortest straight line between the boundary or property lines:**

- ❖ Mandatory Site Requirement 3(a): Sites within one (1) mile of a development funded in a previous LIHTC cycle that has not placed in service and achieved 90% physical occupancy as of the application deadline.

CONCERN: It is suggested that the Authority take an exception of this item if the site is located within an urban area where the need for affordable housing is greater than the amount of tax credits that are available. This could be determined by the market study.

Thank you for your consideration of the items referenced above. Humanities Foundation appreciates all the effort the Authority has put into improving the QAP to further enhance the development of affordable housing in South Carolina.

Respectively,



The Humanities Foundation, Inc.
Tracy Doran, President