

Palmetto Pointe Apartments

TAB 15

Market Study

- Market Study
- S-2 PMA Analysis
- S-2 Rent Calculation Worksheet



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Market Feasibility Analysis

Palmetto Pointe Apartments
1123 Palmetto Pointe Drive
Newberry, Newberry County, South Carolina 29108

Prepared For

Palmetto Pointe Apartments II, LP
PO Box 514
Killen, Alabama 35645

Effective Date

May 6, 2022

Job Reference Number

22-238 JW

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2022 EXHIBIT S-2 SCSHFDA PRIMARY MARKET AREA ANALYSIS SUMMARY:

Development Name:	Palmetto Pointe Apartments	Total # Units: 48
Location:	1123 Palmetto Pointe Dr., Newberry, SC 29108 (Newberry County)	# LIHTC Units: 48
PMA Boundary:	Newberry County to the north, east, south and west	
Development Type:	<input checked="" type="checkbox"/> Family <input type="checkbox"/> Older Persons	Farthest Boundary Distance to Subject: 20.3 miles

RENTAL HOUSING STOCK (found on page H-1 & 12)

Type	# Properties	Total Units	Vacant Units	Average Occupancy
All Rental Housing	13	566	0	100.0%
Market-Rate Housing	2	66	0	100.0%
Assisted/Subsidized Housing not to include LIHTC	3	165	0	100.0%
LIHTC (All that are stabilized)*	8	335	0	100.0%
Stabilized Comps**	2	92	0	100.0%
Non-stabilized Comps	0	-	-	-

* Stabilized occupancy of at least 93% (Excludes projects still in initial lease up).

** Comparables - comparable to the subject and those that compete at nearly the same rent levels and tenant profile, such as age, family and income.

Subject Development					HUD Area FMR			Highest Unadjusted Comparable Rent	
Units	Bedrooms	Baths	Size (SF)	Proposed Tenant Rent	Per Unit	Per SF	Advantage	Per Unit	Per SF
4	One	1.0	750	\$390	\$628	\$0.84	37.90%	\$915	\$1.08
8	One	1.0	750	\$465	\$628	\$0.84	25.96%	\$915	\$1.08
4	Two	2.0	947	\$430	\$826	\$0.87	47.95%	\$1,000	\$1.00
20	Two	2.0	947	\$550	\$826	\$0.87	33.41%	\$1,000	\$1.00
4	Three	2.0	1,179	\$500	\$1,049	\$0.89	52.34%	\$1,300	\$1.10
8	Three	2.0	1,179	\$625	\$1,049	\$0.89	40.42%	\$1,300	\$1.10
Gross Potential Rent Monthly*				\$25,000	\$39,948		37.42%		

*Market Advantage is calculated using the following formula: Gross HUD FMR (minus) Net Proposed Tenant Rent (divided by) Gross HUD FMR. The calculation should be expressed as a percentage and rounded to two decimal points.

DEMOGRAPHIC DATA (found on page F-3 & G-4)

	2010	2021		2024	
Renter Households		4,272	27.8%	4,248	27.2%
Income-Qualified Renter HHs (LIHTC)		1,667	39.0%	1,625	38.3%
Income-Qualified Renter HHs (MR)		-	-	-	-

TARGETED INCOME-QUALIFIED RENTER HOUSEHOLD DEMAND (found on page G-4)

Type of Demand	50%	60%	Market-rate	Other:___	Other:___	Overall
Renter Household Growth	-38	-37				-42
Existing Households (Overburd + Substand)	771	697				821
Homeowner conversion (Seniors)	-	-				-
Other:	0	0				0
Less Comparable/Competitive Supply	0	0				0
Net Income-qualified Renter HHs	733	660				779

CAPTURE RATES (found on page G-4)

Targeted Population	50%	60%	Market-rate	Other:___	Other:___	Overall
Capture Rate	1.6%	5.5%				6.2%

ABSORPTION RATE (found on page G-7)

Absorption Period: 3 months

2022 S-2 RENT CALCULATION WORKSHEET

# Units	Bedroom Type	Proposed Tenant Paid Rent	Net Proposed Tenant Rent by Bedroom Type	Gross HUD FMR	Gross HUD FMR Total	Tax Credit Gross Rent Advantage	
	0 BR		\$0		\$0		
	0 BR		\$0		\$0		
	0 BR		\$0		\$0		
	1 BR		\$0		\$0		
4	1 BR	\$390	\$1,560	\$628	\$2,512		
8	1 BR	\$465	\$3,720	\$628	\$5,024		
	2 BR		\$0		\$0		
4	2 BR	\$430	\$1,720	\$826	\$3,304		
20	2 BR	\$550	\$11,000	\$826	\$16,520		
	3 BR		\$0		\$0		
4	3 BR	\$500	\$2,000	\$1,049	\$4,196		
8	3 BR	\$625	\$5,000	\$1,049	\$8,392		
	4 BR		\$0		\$0		
	4 BR		\$0		\$0		
	4 BR		\$0		\$0		
Totals	48		\$25,000		\$39,948		37.42%

B. Project Description

Project Name:	Palmetto Pointe Apartments
Location:	1123 Palmetto Pointe Drive, Newberry, South Carolina 29108 (Newberry County)
Census Tract:	9505.02
Target Market:	Family
Construction Type:	Renovation of Existing Development
Funding Source:	LIHTC

The subject project involves the renovation of the 48-unit Palmetto Pointe Apartments at 1123 Palmetto Pointe Drive in Newberry, South Carolina. Built in 2006, the project operates under the Low-Income Housing Tax Credit (LIHTC) program with units targeting family (general-occupancy) households earning up to 50% and 60% of Area Median Household Income (AMHI). According to management, the project is currently 100.0% occupied and maintains a 70-household waiting list.

The project will be renovated utilizing funding from the LIHTC program, which will involve the extensive rehabilitation of each unit and the community spaces. Once renovations are complete, the project will continue to target households with incomes of up to 50% and 60% of AMHI. All renovations are expected to be complete by October 2023. Note that rents will change by -\$9 to \$45, or -2.1% to 10.7%, post renovations. Additional details of the subject project are as follows:

Proposed Unit Configuration										
Total Units	Bedroom Type	Baths	Style	Square Feet	% AMHI	Current Rent	Proposed Rents			Max. Allowable LIHTC Gross Rent
							Collected Rent	Utility Allowance	Gross Rent	
4	One-Br.	1.0	Garden	750	50%	\$379	\$390	\$145	\$535	\$668
8	One-Br.	1.0	Garden	750	60%	\$420	\$465	\$145	\$610	\$801
4	Two-Br.	2.0	Garden	947	50%	\$439	\$430	\$195	\$625	\$802
20	Two-Br.	2.0	Garden	947	60%	\$505	\$550	\$195	\$745	\$963
4	Three-Br.	2.0	Garden	1,179	50%	-	\$500	\$253	\$753	\$926
8	Three-Br.	2.0	Garden	1,179	60%	\$600	\$625	\$253	\$878	\$1,112
48	Total									

Source: Palmetto Pointe Apartments II, LP & Palmetto Pointe Apartments property management
 AMHI – Area Median Household Income (2022 National Non-Metropolitan Median Income)

Building/Site Information	
Residential Buildings:	Six (6) two-story buildings
Building Style:	Walk-up
Community Space:	Stand-alone building
Acres:	9.2

Construction Timeline	
Original Year Built:	2006
Renovation Start:	January 2023
Begin Preleasing:	August 2023
Renovation End:	October 2023

Unit Amenities		
• Electric Range	• Microwave	• Carpet & Composite Flooring
• Refrigerator	• Washer/Dryer Hookups	• Window Blinds
• Garbage Disposal	• Central Air Conditioning	• Exterior Storage Closet
• Dishwasher	• Patio/Balcony	• Ceiling Fans

Community Amenities		
• Clubhouse/Community Room	• Community Kitchen	• On-Site Management
• Common Area Wi-Fi	• Laundry Room	• Surface Parking Lot (108 Spaces)
• Multipurpose Room	• Playground	

Utility Responsibility							
	Heat	Hot Water	Cooking	General Electric	Cold Water	Sewer	Trash
Paid By	Tenant	Tenant	Tenant	Tenant	Tenant	Tenant	Landlord
Source	Electric	Electric	Electric				

Current Occupancy Status			
Total Units	Vacant Units	Occupancy Rate	Waiting List
48	0	100.0%	70 Households

PLANNED RENOVATION & CURRENT OCCUPANCY:

A detailed scope of renovations was not available at the time of this report. The subject property is anticipated to include, but not limited to, the following renovations:


- Replace all flooring
- Install new kitchen appliances, cabinets and countertops
- Paint the interior of all the units
- New bathroom fixtures, replace/refurbish tubs and tub surrounds as needed
- Install new water heaters, HVAC equipment and appliances
- Install new windows and blinds
- Update exterior with siding/paint
- Repair all sidewalks to remove any trip hazards and improve accessibility
- Repair, seal coat and re-stripe the parking lots
- Replace roofs where necessary

The subject project consists of 48 one-, two- and three-bedroom units that are 100.0% occupied, with a 70-household waiting list for the next available unit. The project currently charges \$379 and \$420 for a one-, \$439 and \$505 for a two- and \$600 for a three-bedroom unit, depending on targeted income level. As noted, rents will change by -\$9 to \$45, or -2.1% to 10.7%, post renovations. As it is anticipated that all current tenants will continue to income-qualify to reside at the subject project post renovations, it is likely that most current residents will remain at the property.

A state map and an area map are on the following pages.



State of South Carolina
Newberry, SC

★ Site
 State Boundary



142,553,381

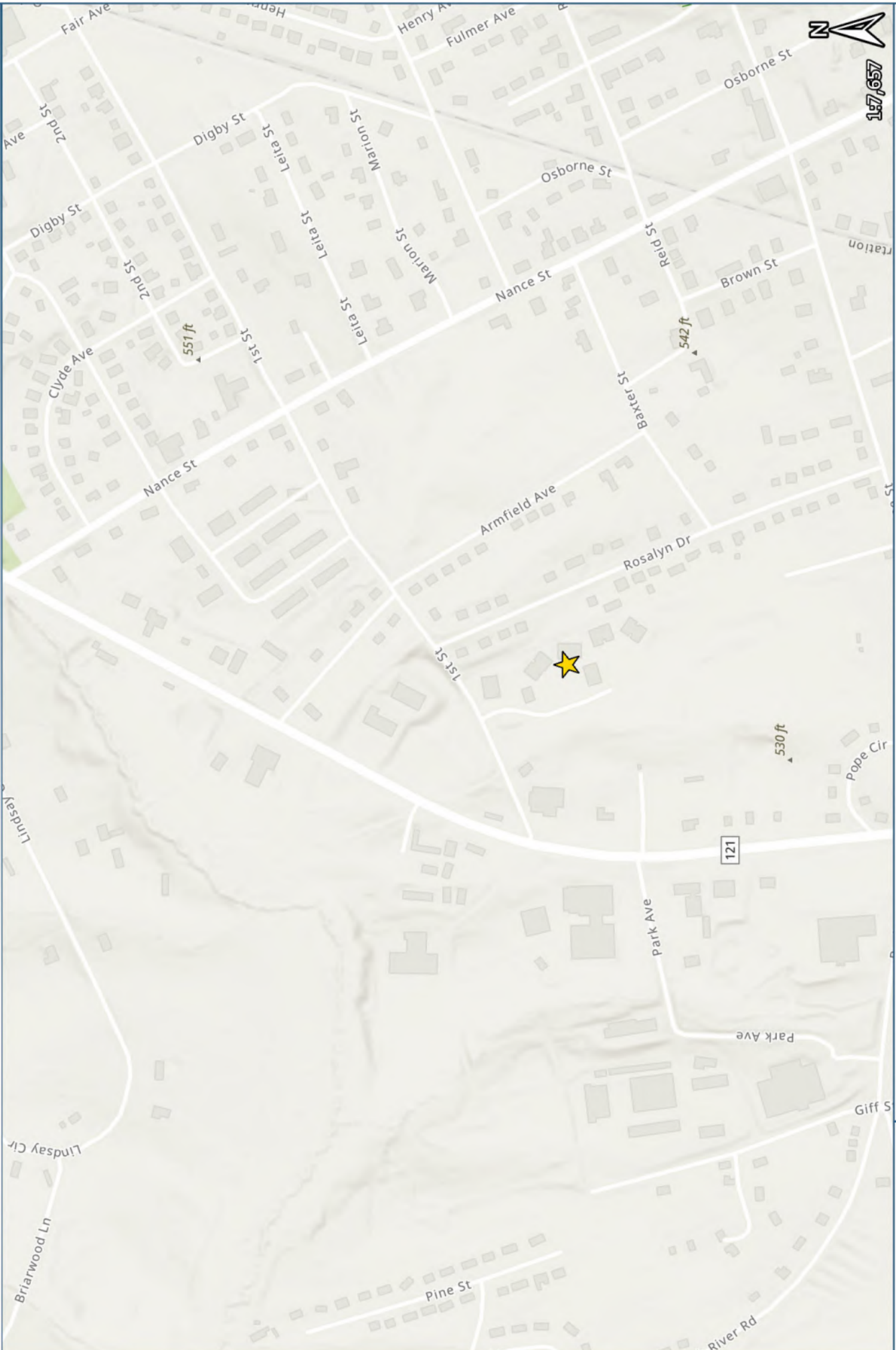


Esri, HERE, Garmin, FAO, NOAA, USGS, EPA, NPS, Esri, USGS
 Additional Source(s): Bowen National Research



Area
Newberry, SC

★ Site



0 0.04 0.07 0.11 0.14



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Additional Source(s): Bowen National Research

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Additional Source(s): Bowen National Research

C. Site Description and Evaluation

1. SITE INSPECTION DATE

Bowen National Research personally inspected the subject site during the week of April 18th, 2022. The following is a summary of our site evaluation, including an analysis of the site's proximity to community services.

2. SITE DESCRIPTION AND SURROUNDING LAND USES

The subject site, Palmetto Pointe Apartments, is located at 1123 Palmetto Pointe Drive in Newberry, South Carolina. Located within Newberry County, Newberry is approximately, 36.0 miles east of Greenwood, South Carolina and approximately 45.0 miles northwest of Columbia, South Carolina. Following is a description of surrounding land uses:

North -	The northern boundary is defined by 1 st Street, a two-lane roadway with light traffic patterns. Continuing north are wooded land, Knuckle Tire and Service center and State Route 121, a two-lane roadway with moderate traffic patterns. A truck parts center and wooded land extend farther north.
East -	Directly east are single-family home in good condition and wooded land. Additional single-family homes and undeveloped land continue and extend farther east of the site.
South -	Directly south are undeveloped land, followed by single-family homes in good condition. Farther east are larger commercial buildings in good condition, with wooded land extending beyond
West -	Wooded land borders the site to the west, followed by local businesses and State Route 121. Additional local businesses extend farther west of the site.

The surrounding land uses predominantly consist of wooded land and single-family homes in good condition, which are conducive to multifamily housing. This is further evidenced by the subject's full occupancy and waiting list. Overall, the subject property fits well with the surrounding land uses, which should continue to contribute to its marketability.

3. PROXIMITY TO COMMUNITY SERVICES AND INFRASTRUCTURE

The site is served by the community services detailed in the following table:

Community Services	Name	Driving Distance From Site (Miles)
Major Highways	State Route 121	0.1 West
	State Route 34	1.7 Southeast
	U.S. Highway 76	1.9 Northeast
Public Bus Stop	N/A	-
Major Employers/ Employment Centers	MacLean Power Systems	0.3 Southwest
	Carolina Cutting Tools	0.4 Southwest
	Kraft-Heinz	1.5 North
	Walmart Supercenter	3.3 Southeast
Convenience Store	1 Stop	0.4 North
	Country Corner	0.5 South
	Scotchman	0.8 Northeast
Grocery	Food Lion	2.5 East
	Walmart Supercenter	3.3 Southeast
Discount Department Store	Family Dollar	0.3 Southwest
	Dollar Tree	1.0 Northeast
	Triple Threat Thrift	1.8 Southeast
	Walmart Supercenter	3.3 Southeast
Shopping Center/Mall	Carolina Park Shopping Center	2.5 East
Schools:		
Elementary	Newberry Elementary School	1.0 Southeast
Middle/Junior High	Newberry Middle School	2.1 South
High	Newberry High School	4.1 Southeast
Hospital	Newberry County Memorial Hospital	2.6 East
Police	Newberry Police Department	1.4 Southeast
Fire	Newberry City Fire Department	1.4 Southeast
Post Office	U.S. Post Office	1.6 Southeast
Bank	First America Cash Advance	2.3 Northeast
	Truist	2.7 East
	AllSouth Federal Credit Union	3.1 East
Recreation	Helena Community Center	0.8 Southwest
	Wells Park	1.0 East
	Unique Fitness Center	1.8 Southeast
Gas Station	1 Stop	0.4 North
	Country Corner	0.5 South
	Valero	0.8 Northeast
Pharmacy	LoRex Drugs	3.3 East
	Walgreens Pharmacy	3.3 East
Restaurant	Restaurante El Sorullo	0.5 North
	The Grille on Main	1.7 Southeast
	Cabana Cafe	1.7 Southeast
Day Care	Newberry CDC	2.1 East
	Triangle Day Care & Activity	2.4 Southeast
Library	Newberry County Library System	1.7 Southeast

N/A – Not Available

As the preceding table illustrates, many community services are located within approximately 3.0 miles of the subject site, including gas stations/convenience stores, grocery, shopping, restaurants and banks.

Public safety services are provided by the Newberry County Police and Fire departments, both of which are located 1.4 miles southeast of the site. The Newberry County School District serves the site, with all applicable attendance schools located within 4.1 miles. Additionally, the nearest full-service hospital is Newberry County Memorial Hospital, located 2.6 miles east. It is of note that local parks, a community center and fitness centers are located within 1.8 miles of the site.

Overall, the site's proximity to most community services and public safety services is expected to contribute to its continued marketability.

4. SITE PHOTOGRAPHS

Photographs of the subject site and surrounding land uses are on the following pages.

Palmetto Pointe



View of site from the north



View of site from the northeast



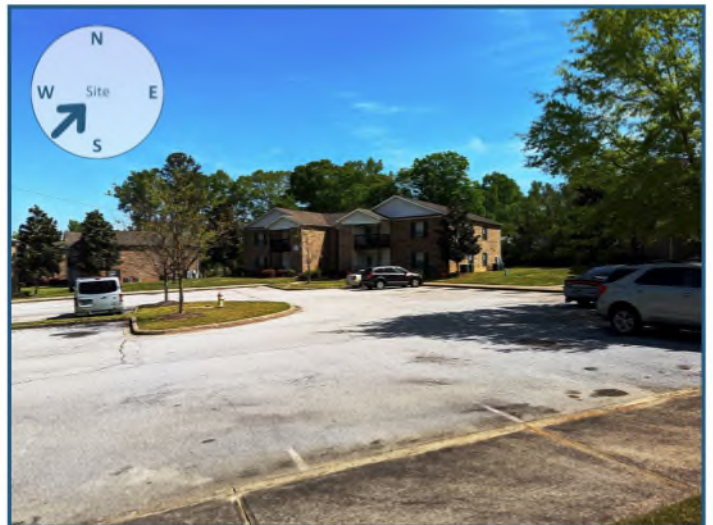
View of site from the east



View of site from the southeast



View of site from the south



View of site from the southwest

Palmetto Pointe



View of site from the west



View of site from the northwest



North view from site



Northeast view from site



East view from site



Southeast view from site

Palmetto Pointe



South view from site



Southwest view from site



West view from site



Northwest view from site



Streetscape: West view of 1st Street



Streetscape: East view of 1st Street

Palmetto Pointe



Recreation Area: Playground



Picnic Area



Laundry Facility (View A)



Laundry Facility (View B)



Community Room (View A)



Community Room (View B)

Palmetto Pointe



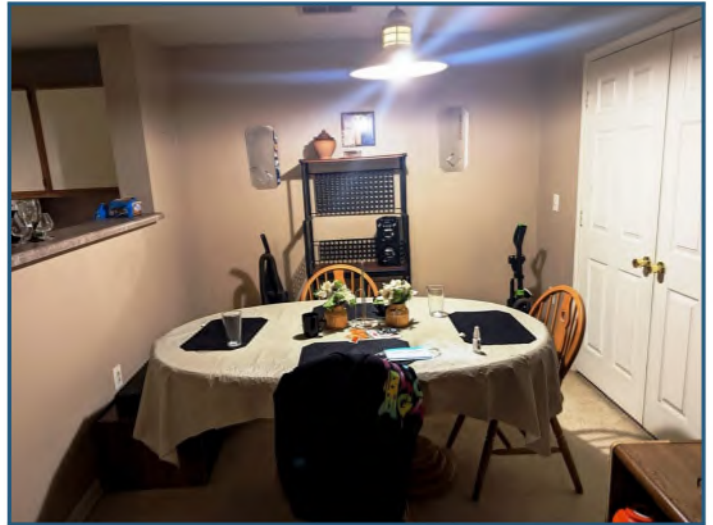
Community Room: Kitchen



One-Bedroom (Living Room- View A)



One-Bedroom (Living Room- View B)



One-Bedroom (Dining Room)

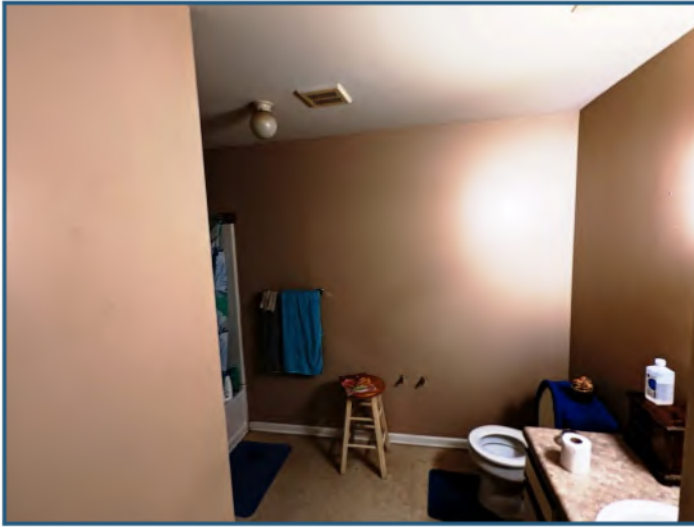


One-Bedroom (Kitchen)



One-Bedroom

Palmetto Pointe



One-Bedroom (Bathroom-View A)



One-Bedroom (Bathroom-View B)



Two-Bedroom (Living Room-View A)



Two-Bedroom (Living Room-View B)



Two-Bedroom (Dining Room)

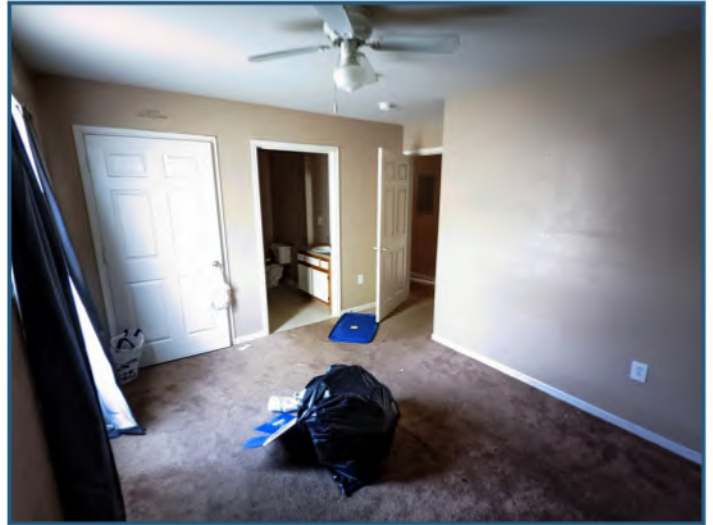


Two-Bedroom (Kitchen)

Palmetto Pointe



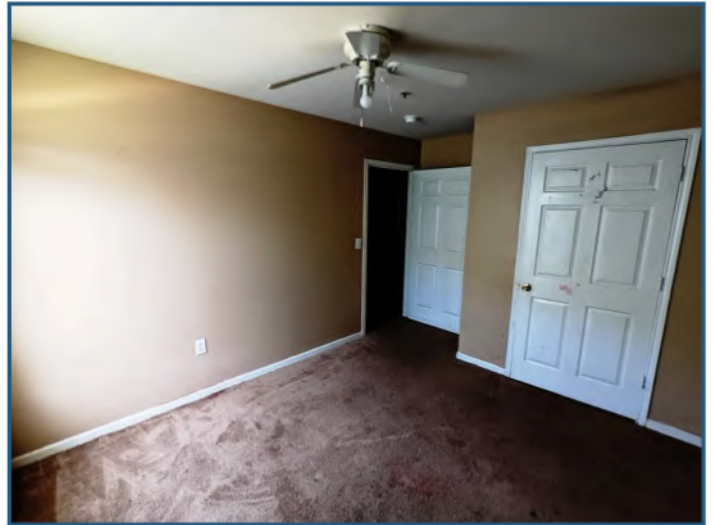
Two-Bedroom (Master Bedroom - View A)



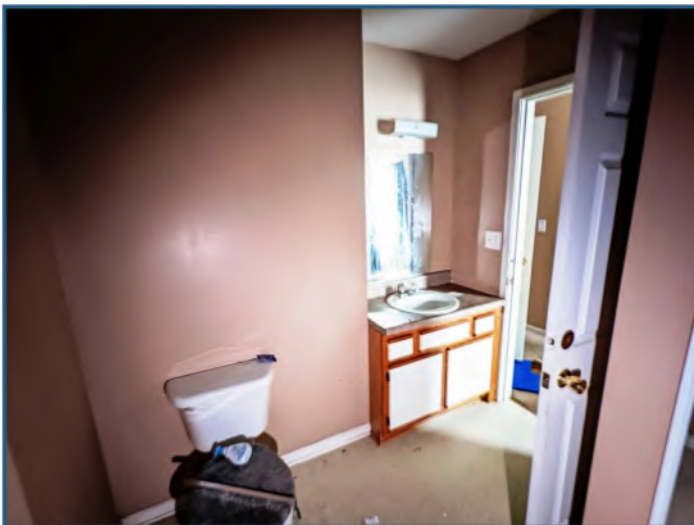
Two-Bedroom (Master Bedroom - View B)



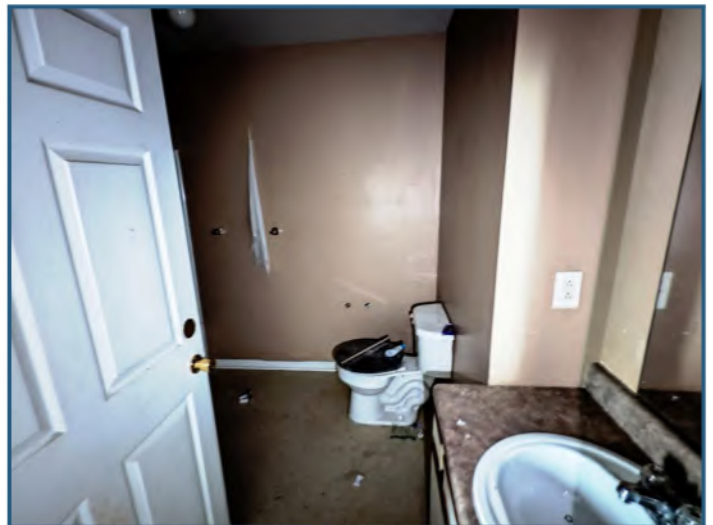
Two-Bedroom (Second Bedroom - View A)



Two-Bedroom (Second Bedroom - View B)

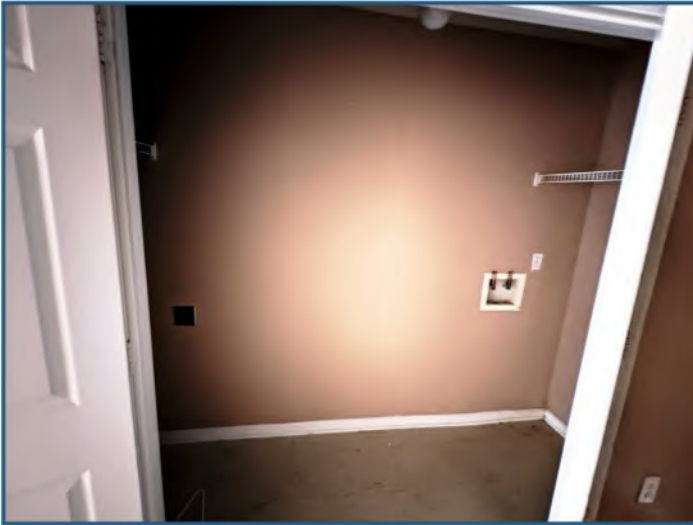


Two-Bedroom (Full Bathroom #1)



Two-Bedroom (Full Bathroom #2)

Palmetto Pointe



Two-Bedroom (Laundry)



Three-Bedroom (Living Room- View A)



Three-Bedroom (Living Room- View B)



Three-Bedroom (Dining Room)



Three-Bedroom (Kitchen)

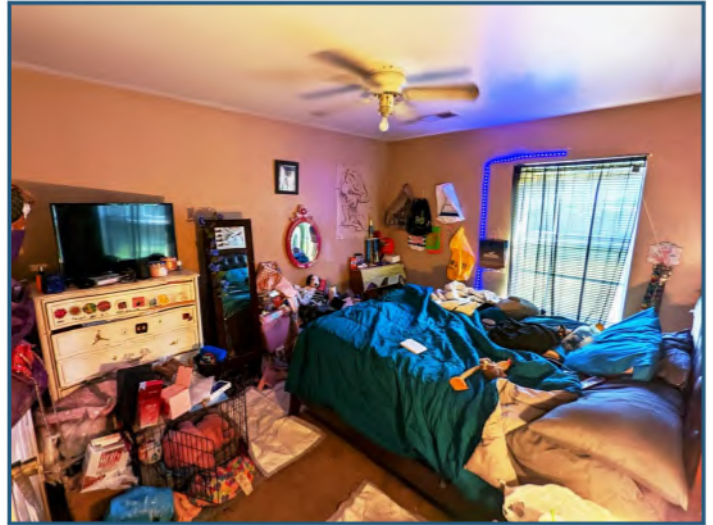


Three-Bedroom (Master Bedroom - View A)

Palmetto Pointe



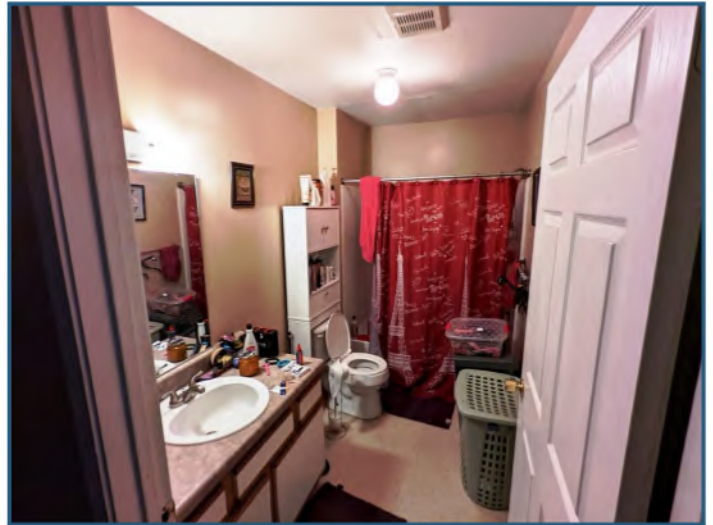
Three-Bedroom (Master Bedroom - View B)



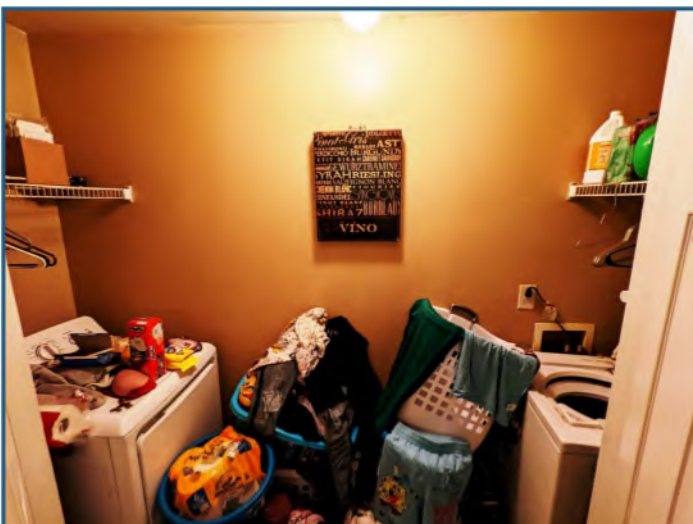
Three-Bedroom (Second Bedroom)



Three-Bedroom (Third Bedroom)



Three-Bedroom (Full Bathroom)



Three-Bedroom (Laundry)

5. SITE AND COMMUNITY SERVICES MAPS

Maps of the subject site and relevant community services follow.



Site
Newberry, SC

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Site Boundary



1:2,945



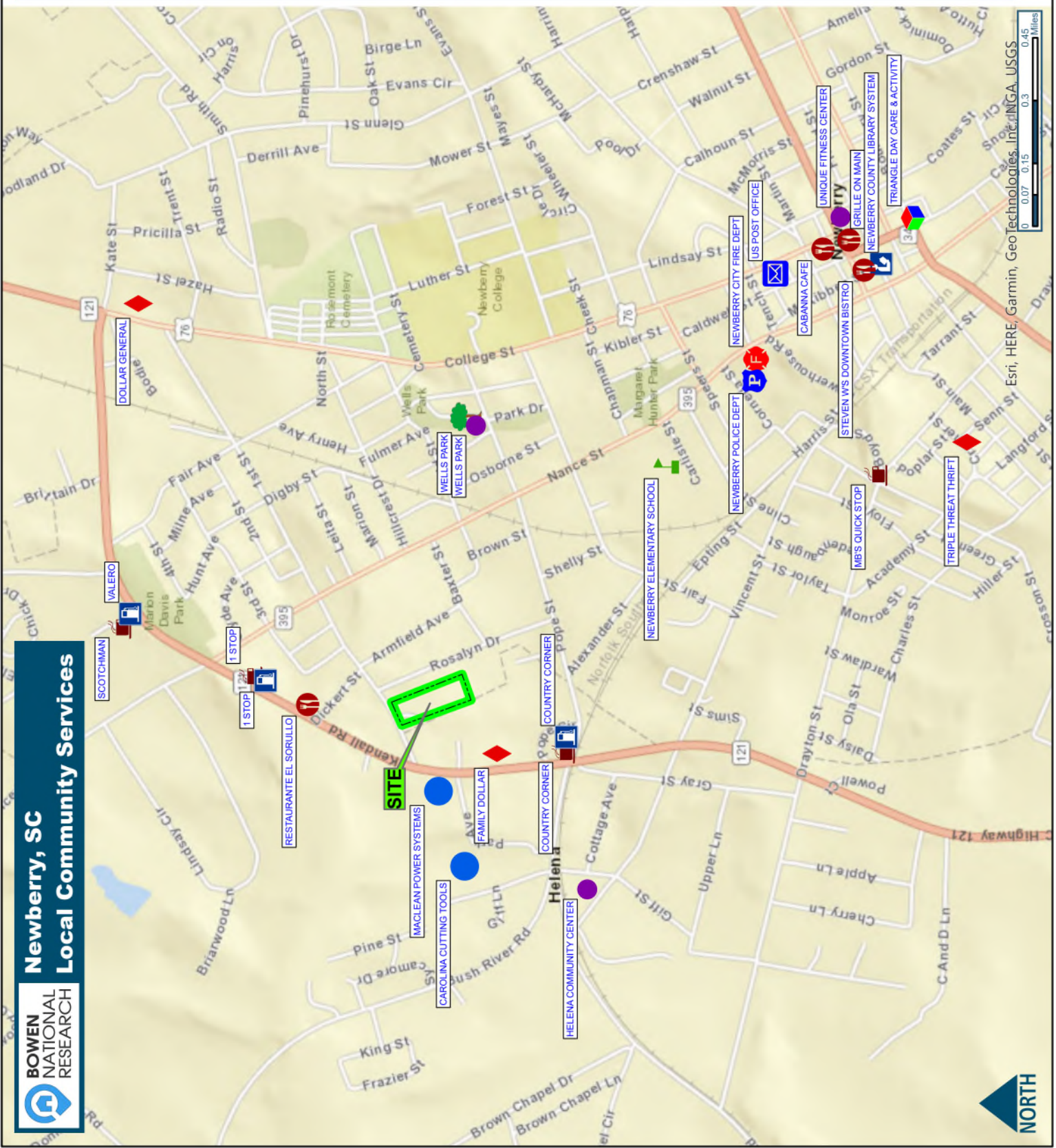
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Additional Source(s): Bowen National Research

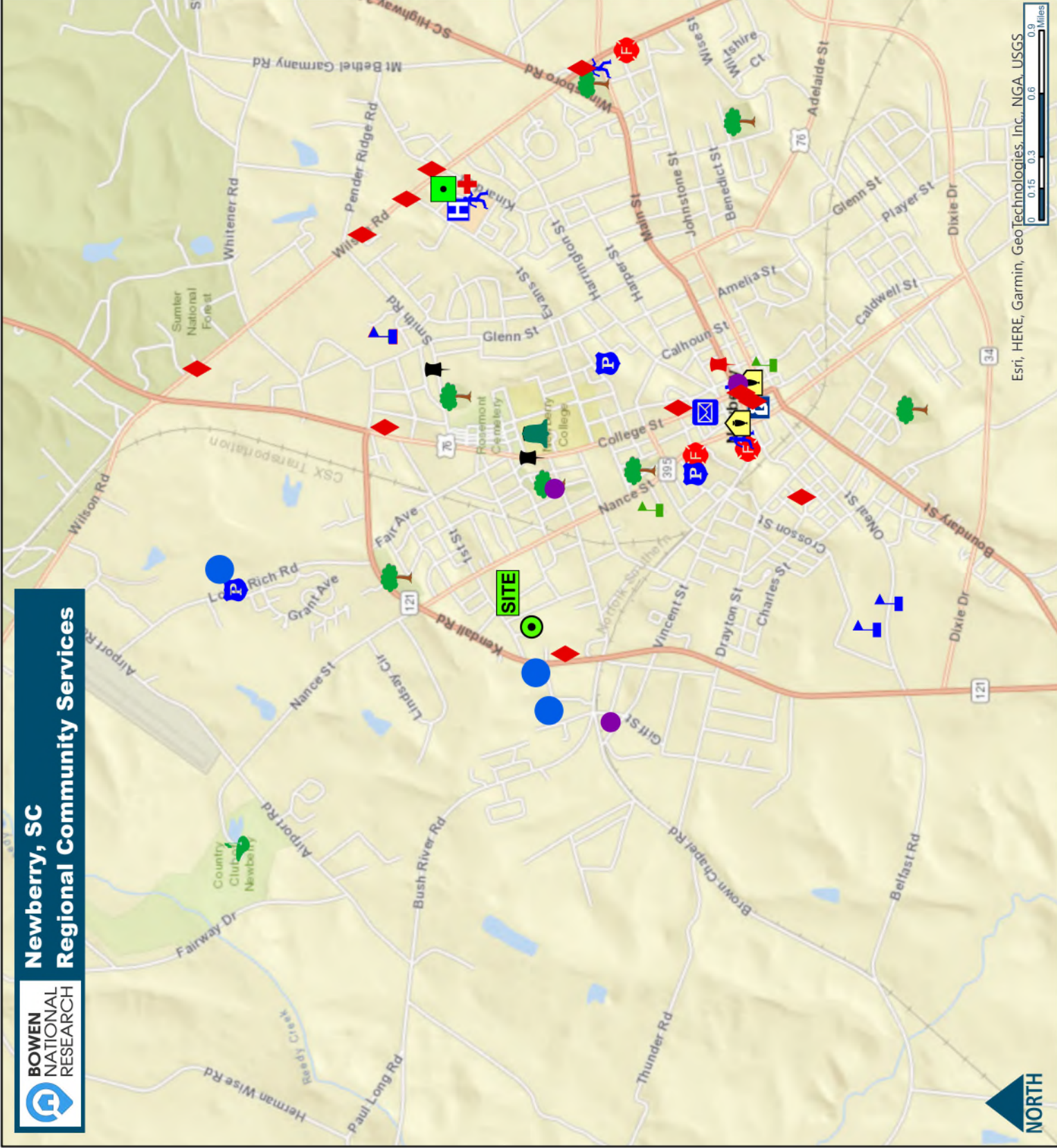
- Legend**
-  Site Area
 -  Child Care
 -  Convenience Store
 -  Elementary School
 -  Fire
 -  Gas
 -  Library
 -  Park
 -  Police
 -  Post Office
 -  Recreation Center
 -  Restaurant
 -  Shopping
 -  Employer 1000-5000



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- Legend**
- Site
 - Entertainment
 - Elementary School
 - Fire
 - Fitness Center
 - Golf
 - High School
 - Hospital
 - Library
 - Medical Center
 - Middle School
 - Museum
 - Park
 - Police
 - Post Office
 - Recreation Center
 - Shopping
 - Stadium
 - University
 - Employer 1000-5000
 - Shopping Center



Esri, HERE, Garmin, GeoTechnologies, Inc., NGA, USGS



1:40,000



6. CRIME ISSUES

The primary source for Crime Risk data is the FBI Uniform Crime Report (UCR). The FBI collects data from each of roughly 16,000 separate law enforcement jurisdictions across the country and compiles this data into the UCR. The most recent update showed an overall coverage rate of 95% of all jurisdictions nationwide with a coverage rate of 97% of all jurisdictions in metropolitan areas.

Applied Geographic Solutions uses the UCR at the jurisdictional level to model each of the seven crime types at other levels of geography. Risk indexes are standardized based on the national average. A Risk Index value of 100 for a particular risk indicates that, for the area, the relative probability of the risk is consistent with the average probability of that risk across the United States.

It should be noted that aggregate indexes for total crime, personal crime and property crime are not weighted, and murder is no more significant statistically in these indexes than petty theft. Thus, caution should be exercised when using them.

Total crime risk for the site's ZIP Code is 148, with an overall personal crime index of 139 and a property crime index of 149. Total crime risk for Newberry County is 108, with indexes for personal and property crime of 106 and 108, respectively.

	Crime Risk Index	
	Site ZIP Code	Newberry County
Total Crime	148	108
Personal Crime	139	106
Murder	167	129
Rape	114	89
Robbery	71	60
Assault	170	127
Property Crime	149	108
Burglary	138	120
Larceny	156	106
Motor Vehicle Theft	118	102

Source: Applied Geographic Solutions

The crime risk index within the site's ZIP Code (148) is slightly above both those of Newberry County (108) and the nation (100). Despite the slightly elevated crime risk index within the site area, this has not had any impact on the subject's marketability, as evidenced by its 100.0% occupancy rate and waiting list of up to 70 households for the next available unit.

A map illustrating crime risk is on the following page.



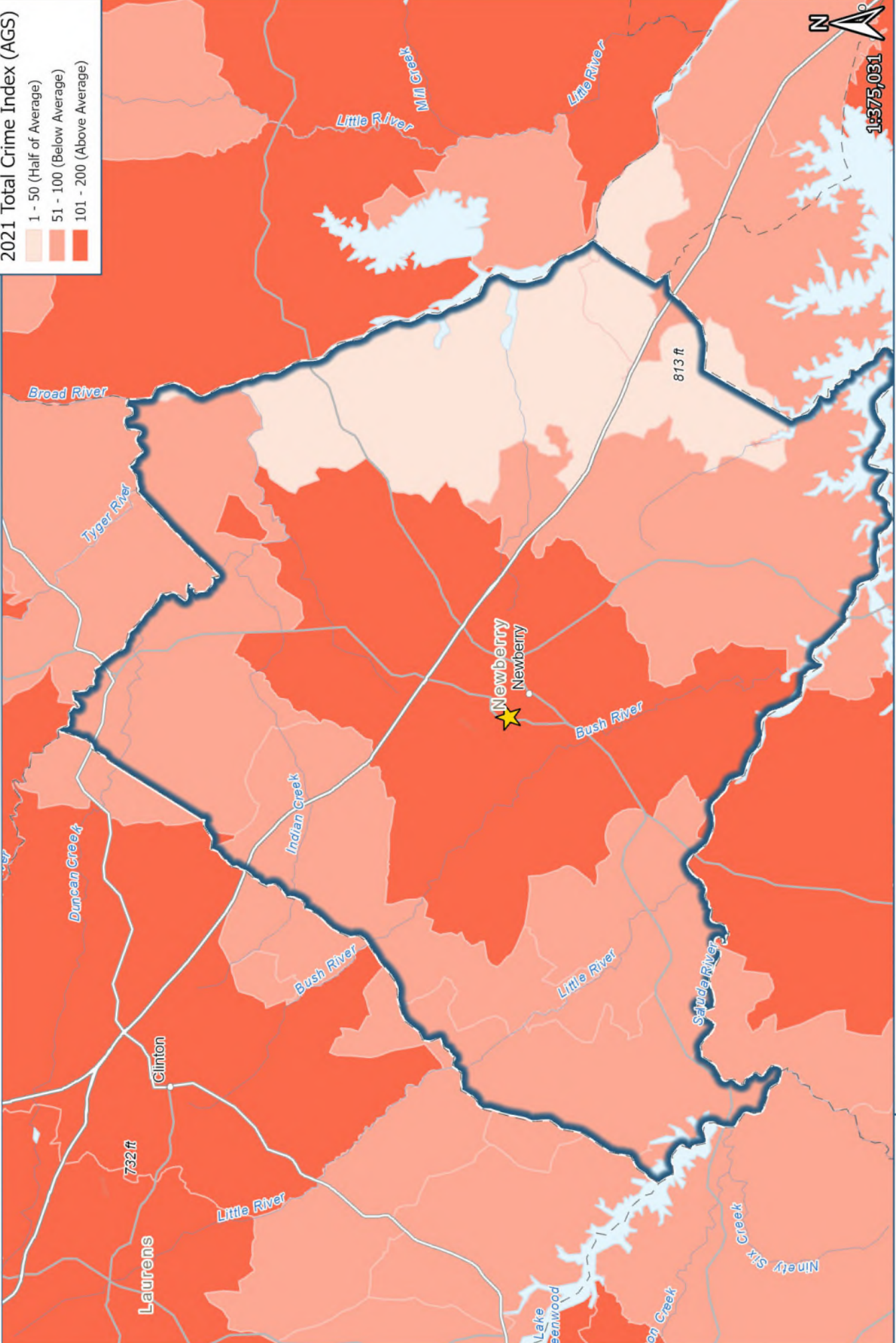
Crime
Newberry, SC

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2021 Total Crime Index (AGS)

- 1 - 50 (Half of Average)
- 51 - 100 (Below Average)
- 101 - 200 (Above Average)



1:375,031

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7. ACCESS AND VISIBILITY

The subject site is bound by 1st Street to the north, a two-lane roadway with light traffic patterns. As such, ingress and egress are convenient, with clear lines of sight provided in both directions of travel. Additionally, the subject project is within 1.9 miles of State Routes 34 and 121, as well as U.S. Highway 76. Overall, access to and from the site is considered good.

Visibility of the site is considered good within the immediate site neighborhood; however, the site is buffered from the heavier traffic patterns along State Route 121, arterial roadway utilized to access the site. Nonetheless, given that the subject development is fully occupied with a waiting list, the lack of visibility has not had any impact on its marketability. Therefore, visibility of the site is considered adequate.

8. VISIBLE OR ENVIRONMENTAL ISSUES

No nuisances were observed during our site inspection.

9. OVERALL SITE CONCLUSIONS

The subject site is located within a primarily residential area of Newberry, with surrounding land uses primarily consisting of single-family homes in good condition and undeveloped land. Therefore, the subject property fits in well with the surrounding land uses. Access to and from the site is considered good, as it is within 1.9 miles of State Routes 34 and 121, as well as U.S. Highway 76. Visibility of the subject site is limited due to the obstructed views of the site from the surrounding land uses. However, the limited visibility has not had an adverse impact on the site's marketability, as evidenced by its full occupancy and waiting list. The site is within approximately 3.0 miles of most shopping, employment, recreation, entertainment and education opportunities. Public safety and social services are all within 2.6 miles. Overall, we consider the site's location and proximity to community services to have a positive effect on its continued marketability.

D. Primary Market Area Delineation

The Primary Market Area (PMA) is the geographical area from which most of the support for the subject development is expected to continue to originate. The Newberry Site PMA was determined through interviews with management at the subject site, area leasing agents and the personal observations of our analysts. The personal observations of our analysts include physical and/or socioeconomic differences in the market and a demographic analysis of the area households and population.

The Newberry Site PMA includes all of Newberry, Whitmire, Silverstreet, Prosperity, Pomaria, Little Mountain and Peak, as well as the remaining unincorporated areas of Newberry County. The boundaries of the Site PMA are the boundaries of Newberry County to the north, east, south and west. All boundaries of the Site PMA are generally within approximately 20.0 miles of the site. The Site PMA includes all of, or portions of, the following Census Tracts:

9501.00	9502.01	9502.02	9503.00
9505.02*	9506.01	9506.02	9507.00

*Subject site location

Mary Sims, Property Manager of Palmetto Pointe Apartments (subject site), stated that the majority of her property's demand derives from all over Newberry County, thus confirming the Site PMA.

Sara Staten, Property Manager of Nance Forest (Map ID 8), a government-subsidized community in Newberry, confirmed the Site PMA, further explaining that most of her property's support originates from all over Newberry County.

Kim Yarborough, Property Manager of Pineridge Apartments (Map ID 12), a government-subsidized Tax Credit property in Prosperity, confirmed the Site PMA, while also stating that many of her property's residents are longtime residents of Newberry that have moved all over different portions of Newberry. Ms. Yarborough believes that a new rental community within Newberry will experience similar trends.

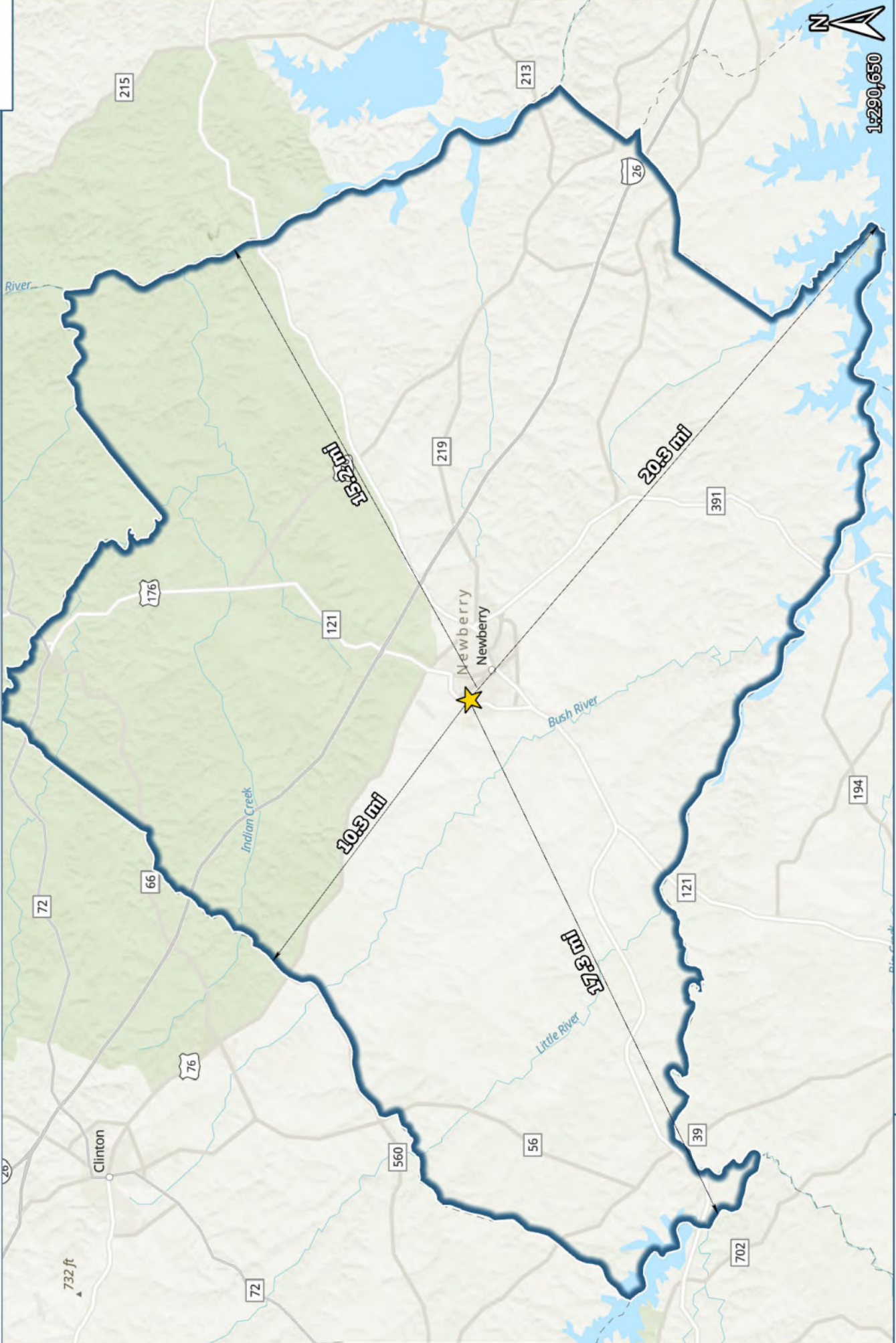
A modest portion of support may originate from some of the outlying areas of Newberry County; we have not, however, considered any secondary market area in this report.

A map delineating the boundaries of the Site PMA is included on the following page.



Primary Market Area
Newberry, SC

-  Site
-  PMA



0 1.45 2.9 4.35 5.8



Esri, NASA, NGA, USGS, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS
Additional Source(s): Bowen National Research

1:290,650

E. Market Area Economy

1. EMPLOYMENT BY INDUSTRY

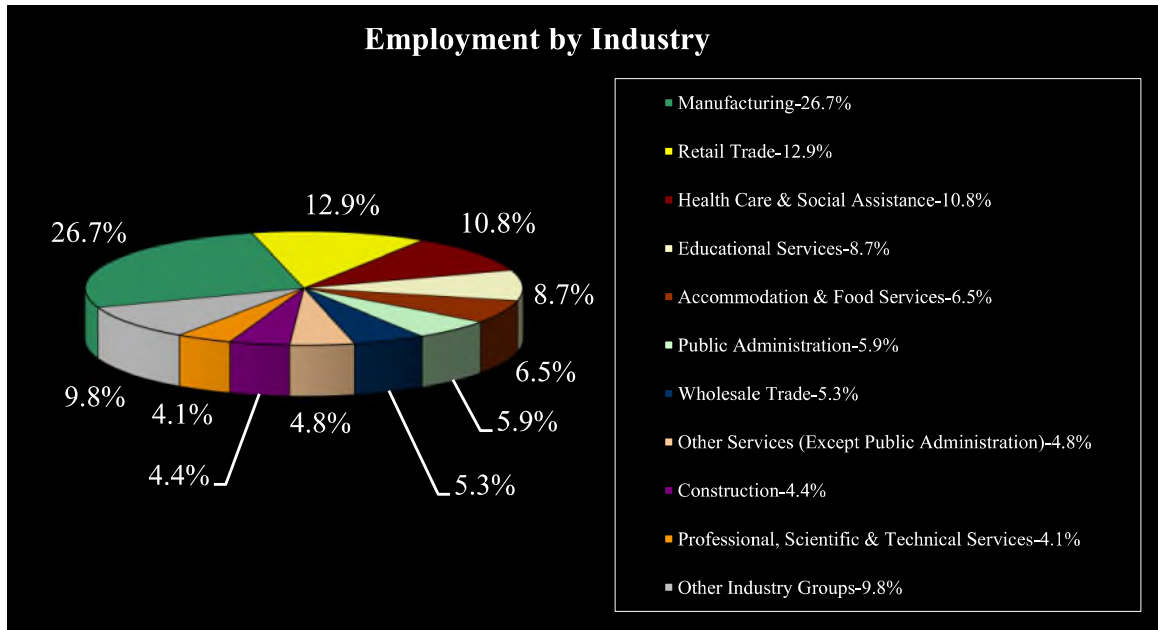
The labor force within the Newberry Site PMA is based primarily in three sectors. Manufacturing (which comprises 26.7%), Retail Trade and Health Care & Social Assistance comprise over 50% of the Site PMA labor force. Employment in the Newberry Site PMA, as of 2021, was distributed as follows:

NAICS Group	Establishments	Percent	Employees	Percent	E.P.E.
Agriculture, Forestry, Fishing & Hunting	19	1.6%	465	2.9%	24.5
Mining	2	0.2%	10	0.1%	5.0
Utilities	2	0.2%	42	0.3%	21.0
Construction	72	6.1%	704	4.4%	9.8
Manufacturing	44	3.7%	4,244	26.7%	96.5
Wholesale Trade	37	3.1%	844	5.3%	22.8
Retail Trade	201	17.1%	2,055	12.9%	10.2
Transportation & Warehousing	28	2.4%	314	2.0%	11.2
Information	18	1.5%	93	0.6%	5.2
Finance & Insurance	63	5.4%	245	1.5%	3.9
Real Estate & Rental & Leasing	54	4.6%	143	0.9%	2.6
Professional, Scientific & Technical Services	78	6.6%	654	4.1%	8.4
Management of Companies & Enterprises	0	0.0%	0	0.0%	0.0
Administrative, Support, Waste Management & Remediation Services	21	1.8%	48	0.3%	2.3
Educational Services	34	2.9%	1,383	8.7%	40.7
Health Care & Social Assistance	101	8.6%	1,709	10.8%	16.9
Arts, Entertainment & Recreation	21	1.8%	185	1.2%	8.8
Accommodation & Food Services	76	6.5%	1,038	6.5%	13.7
Other Services (Except Public Administration)	170	14.4%	758	4.8%	4.5
Public Administration	93	7.9%	930	5.9%	10.0
Nonclassifiable	43	3.7%	18	0.1%	0.4
Total	1,177	100.0%	15,882	100.0%	13.5

Source: 2010 Census; ESRI; Urban Decision Group; Bowen National Research

E.P.E. - Average Employees Per Establishment

Note: Since this survey is conducted of establishments and not of residents, some employees may not live within the Site PMA. These employees, however, are included in our labor force calculations because their places of employment are located within the Site PMA.



2. LOW-INCOME EMPLOYMENT OPPORTUNITIES

Typical wages by job category for the Lower Savannah South Carolina Nonmetropolitan Area are compared with those of South Carolina in the following table:

Typical Wage by Occupation Type		
Occupation Type	Lower Savannah South Carolina Nonmetropolitan Area	South Carolina
Management Occupations	\$91,540	\$103,360
Business and Financial Occupations	\$64,190	\$71,450
Computer and Mathematical Occupations	\$69,790	\$82,100
Architecture and Engineering Occupations	\$67,810	\$80,920
Community and Social Service Occupations	\$42,480	\$44,570
Art, Design, Entertainment and Sports Medicine Occupations	\$42,590	\$49,200
Healthcare Practitioners and Technical Occupations	\$71,480	\$80,470
Healthcare Support Occupations	\$27,960	\$30,030
Protective Service Occupations	\$41,020	\$41,270
Food Preparation and Serving Related Occupations	\$23,190	\$25,070
Building and Grounds Cleaning and Maintenance Occupations	\$25,850	\$28,120
Personal Care and Service Occupations	\$26,210	\$28,680
Sales and Related Occupations	\$31,580	\$37,650
Office and Administrative Support Occupations	\$36,200	\$38,340
Construction and Extraction Occupations	\$42,340	\$44,460
Installation, Maintenance and Repair Occupations	\$45,390	\$47,180
Production Occupations	\$37,530	\$41,540
Transportation and Moving Occupations	\$33,450	\$35,940

Source: U.S. Department of Labor, Bureau of Statistics

Most annual blue-collar salaries range from \$23,190 to \$45,390 within the Lower Savannah South Carolina Nonmetropolitan Area. White-collar jobs, such as those related to professional positions, management and medicine, have an average salary of \$72,962. It is important to note that most occupational types within the Lower Savannah South Carolina Nonmetropolitan Area have lower typical wages than the State of South Carolina's typical wages.

3. AREA'S LARGEST EMPLOYERS

The ten largest manufacturers within Newberry County comprise a total of 4,230 employees and are summarized as follows:

Employer Name	Business Type	Total Employed
Kraft-Heinz	Food Processing	1,500
Samsung Electronics	Digital Appliances	1,300
Georgia-Pacific Corp.	Southern Pine Plywood	275
Valmont Composite Structures	Fiberglass Light Poles	200
Komatsu America	Wheel Loaders & Forklifts	180
Trucast, Inc.	Turbo Charger Wheels	175
Pioneer Frozen Foods	Frozen Dough Products	160
Kiswire Inc.	Steel Cord	150
West Fraser	Lumber & Wood By-Products	150
ISE Newberry	Egg Processing and Products	140
	Total	4,230

Source: Newberry County Economic Development

Despite multiple attempts, we were unable to receive a response from area economic development representatives regarding the current status of the local economy at the time this report was issued. The following, however, are summaries of some recent and notable economic development activity within the Newberry area via online research:

- Sea Pro Boats, LLC announced a \$3.7 million expansion of their existing manufacturing center at 25214 State Route 121 in Whitmire in October 2021. The expansion is expected to be completed in the spring of 2022 and create 50 new jobs.
- In April 2022, the South Florida Tissue Paper Company finalized the \$1.21 million purchase of a 112-acre plot off Heritage Drive and Riley Road in Newberry. Plans originally called for the construction of a 25,000 square-foot tissue paper warehouse on the property, but after community feedback, the company is considering a housing development for that location, in addition to purchasing more land at a different location in Newberry to build the manufacturing facility.
- Three expansion projects are underway at Newberry College. A new nursing and health care center broke ground in February 2022. The second phase of the sports stadium, which will add 800 seats, broke ground in March 2022 and is expected to be completed by May of 2023. A third phase of the project will renovate the entire stadium, but a construction timeline is not yet available. Additionally, groundbreaking for a new residence hall took place in late April 2022. The 104-bed, apartment-style building is anticipated to open by fall 2023.

- A new Home2 Suites location is under construction off of Interstate 26, across from the Samsung manufacturing facility in Newberry. Plans for the hotel were announced in January 2019, but the original timeline for the project was delayed. Construction is anticipated to resume in early 2022. No estimated completion date was available at the time of our research.

Infrastructure

Project Name	Scope of Work	Status
Midlands Connection Project	Newberry, Lexington, and Richland Counties: Improvements of 16 miles of I-26 from Exit 101 in Irmo to Exit 85 in Little Mountain, including widening roads, replacing overpass bridges, and modifying exit exchanges	Construction began Spring 2020; ECD Spring 2024
Main Street Water Line	Newberry: Installation of new water lines along Main Street, from Glenn Street to Homan Street and from Glenn Street to Kinard Street, including the re-pouring of sidewalks	Under construction; ECD late April 2022
SC 34 Over Norfolk Southern Railroad	Newberry: Replacement of SC 34 bridge over Norfolk Southern Railroad	Under construction; ECD October 2023
I-26 Widening	Lexington, Newberry, and Richland Counties: Widening of I-26 from Exit 85 near SC 202 in Little Mountain to Exit 101 near US 176 in Irmo	Under construction; ECD April 2024
I-26 Rehab and Resurfacing	Newberry County: Rehabilitation of I-26 lanes from mile marker 75 to mile maker 85, including replacement or rehabilitation of seven bridges	Construction anticipated for 2022; ECD N/A

ECD – Estimated Completion Date

N/A – Not Available

WARN (layoff notices)

WARN Notices were reviewed in April 2022 and according to the South Carolina Department of Employment and Workforce, there have been no WARN notices reported for Newberry County over the past 12 months.

COVID-19 Vaccination Rates

The following summarizes COVID-19 vaccination rates for Newberry County, the state of South Carolina, and the United States as of May 2022:

Vaccination Status	Vaccination Rates as of May 2022		
	Newberry County	South Carolina	United States
Fully Vaccinated (% of Total Population)	52.4%	57.0%	66.2%
Booster (% of Total Vaccinated)	40.6%	40.0%	45.9%

Source: Centers for Disease Control

4. EMPLOYMENT TRENDS

The following tables were generated from the U.S. Department of Labor, Bureau of Labor Statistics and reflect employment trends of the county in which the site is located.

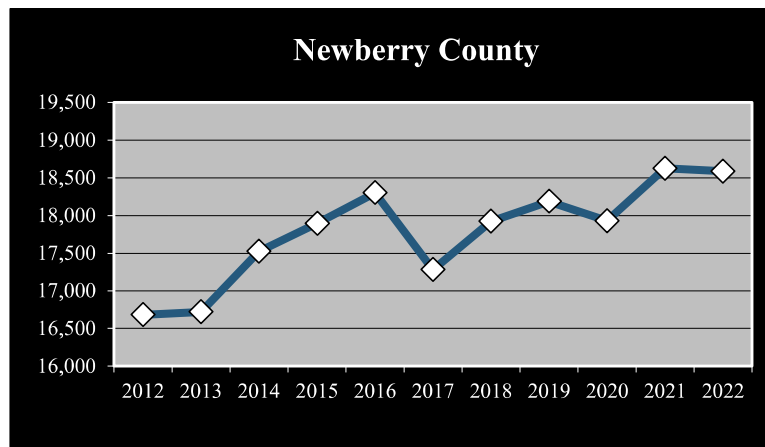
Excluding 2022, the employment base has increased by 7.8% over the past five years in Newberry County, more than the South Carolina state increase of 4.8%. Total employment reflects the number of employed persons who live within the county.

The following illustrates the total employment base for Newberry County, the state of South Carolina and the United States.

Year	Total Employment					
	Newberry County		South Carolina		United States	
	Total Number	Percent Change	Total Number	Percent Change	Total Number	Percent Change
2012	16,683	-	1,992,957	-	143,548,588	-
2013	16,721	0.2%	2,034,404	2.1%	144,904,568	0.9%
2014	17,524	4.8%	2,082,941	2.4%	147,293,817	1.6%
2015	17,895	2.1%	2,134,087	2.5%	149,540,791	1.5%
2016	18,303	2.3%	2,174,301	1.9%	151,934,228	1.6%
2017	17,281	-5.6%	2,166,708	-0.3%	154,721,780	1.8%
2018	17,921	3.7%	2,202,377	1.6%	156,709,685	1.3%
2019	18,190	1.5%	2,256,313	2.4%	158,806,263	1.3%
2020	17,929	-1.4%	2,191,331	-2.9%	149,192,714	-6.1%
2021	18,628	3.9%	2,269,813	3.6%	154,178,982	3.3%
2022*	18,590	-0.2%	2,298,074	1.2%	157,420,669	2.1%

Source: Department of Labor; Bureau of Labor Statistics

*Through March

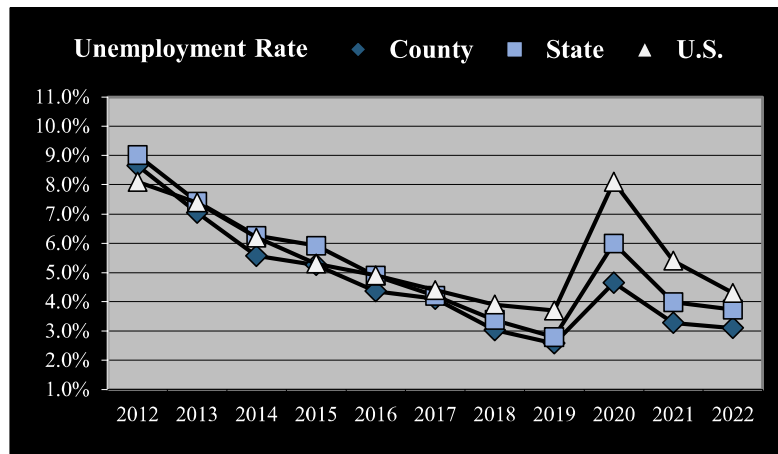


As the preceding illustrates, the Newberry County employment base generally experienced growth between 2012 and 2019. Between 2019 and 2020, the county's employment base declined by 1.4% as the result of the COVID-19 pandemic. On a positive note, the county's economy has improved thus far through March of 2022, as its employment base increased by 3.7%, more than doubling the jobs lost during the pandemic.

Unemployment rates for Newberry County, the state of South Carolina and the United States are illustrated as follows:

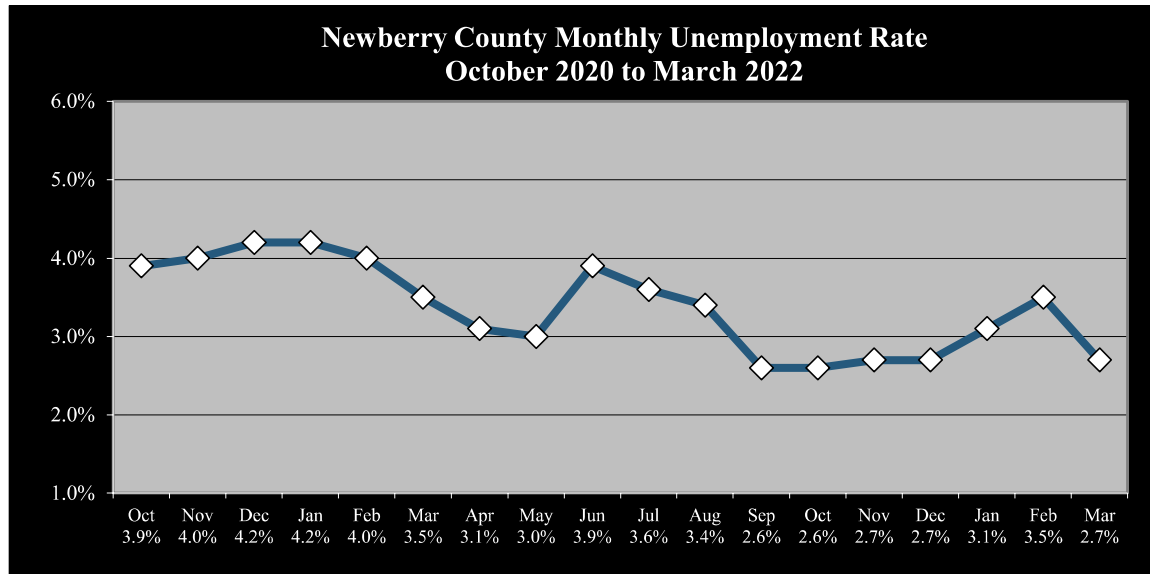
Year	Unemployment					
	Newberry County		South Carolina		United States	
	Total Number	Percent	Total Number	Percent	Total Number	Percent
2012	1,578	8.7%	197,246	9.0%	12,683,816	8.1%
2013	1,272	7.1%	163,472	7.4%	11,624,030	7.4%
2014	1,033	5.6%	139,485	6.3%	9,774,435	6.2%
2015	991	5.3%	133,750	5.9%	8,419,872	5.3%
2016	832	4.4%	111,753	4.9%	7,857,015	4.9%
2017	739	4.1%	95,058	4.2%	7,119,353	4.4%
2018	562	3.0%	77,054	3.4%	6,411,465	3.9%
2019	485	2.6%	64,876	2.8%	6,100,479	3.7%
2020	871	4.7%	139,532	6.0%	13,122,634	8.1%
2021	634	3.3%	94,553	4.0%	8,751,466	5.4%
2022*	587	3.1%	89,190	3.7%	7,069,933	4.3%

Source: Department of Labor; Bureau of Labor Statistics
 *Through March



Between 2012 and 2019, the unemployment rate within Newberry County declined by over six percentage points, then increased by over two percentage points between 2019 and 2020 as the result of the COVID-19 pandemic. Similar to employment trends, the unemployment rate within the county has improved thus far in 2022, which has declined by nearly two percentage points.

The table on the following page illustrates the monthly unemployment rate in Newberry County for the most recent 18-month period for which data is currently available.



As the preceding table illustrates, the *monthly* unemployment rate within Newberry County has generally trended downward within the preceding 18-month period.

The following table illustrates the county’s monthly unemployment rate since January 2020:

Monthly Unemployment Rate – Newberry County					
Month	Rate	Month	Rate	Month	Rate
2020		2021		2022	
January	3.0%	January	4.2%	January	3.1%
February	2.8%	February	4.0%	February	3.5%
March	3.1%	March	3.5%	March	2.7%
April	7.9%	April	3.1%		
May	6.2%	May	3.0%		
June	5.9%	June	3.9%		
July	5.7%	July	3.6%		
August	4.8%	August	3.4%		
September	4.3%	September	2.6%		
October	3.9%	October	2.6%		
November	4.0%	November	2.7%		
December	4.2%	December	2.7%		

Source: Department of Labor, Bureau of Labor Statistics

The *monthly* unemployment rate in the county increased by over five full percentage points between February and April 2020 due to the COVID-19 pandemic. However, monthly unemployment has since declined to a rate of 2.7% through March 2022.

In-place employment reflects the total number of jobs within the county regardless of the employee's county of residence. The following illustrates the total in-place employment base for Newberry County.

In-Place Employment Newberry County			
Year	Employment	Change	Percent Change
2011	13,298	-	-
2012	13,209	-89	-0.7%
2013	13,078	-131	-1.0%
2014	13,848	770	5.9%
2015	14,123	275	2.0%
2016	14,637	514	3.6%
2017	13,840	-797	-5.4%
2018	14,552	712	5.1%
2019	14,597	45	0.3%
2020	14,310	-287	-2.0%
2021*	14,887	577	4.0%

Source: Department of Labor, Bureau of Labor Statistics

*Through September

Data for 2020, the most recent year that year-end figures are available, indicates in-place employment in Newberry County to be 79.8% of the total Newberry County employment. This means that Newberry County has a high share of employed persons staying in the county for daytime employment.

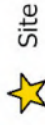
5. EMPLOYMENT CENTERS MAP

A map illustrating the location of the area's largest employers is included on the following page.



Major Employers

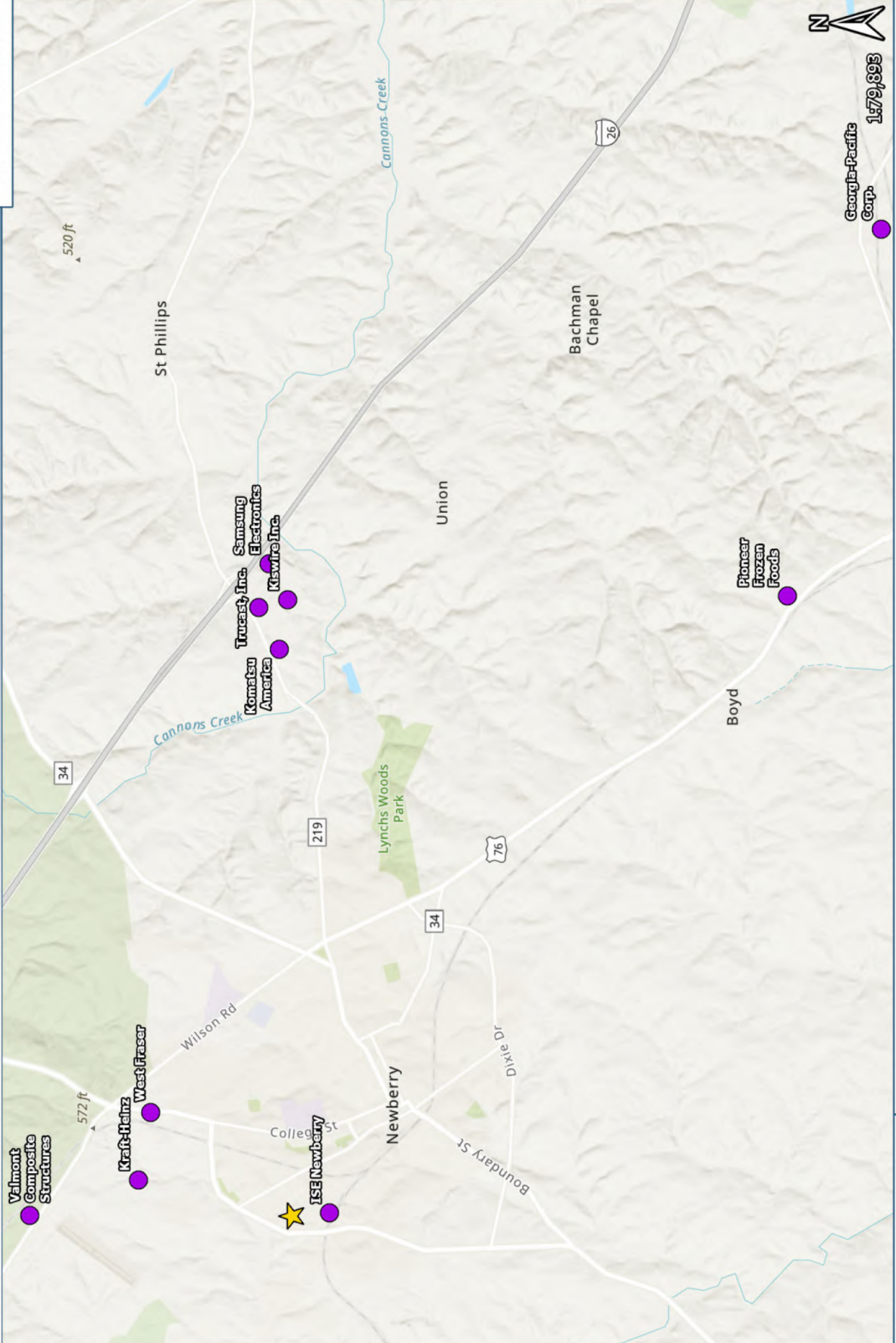
Newberry, SC



Site



Major Employers



0 0.4 0.8 1.2 1.6 Miles

Esri, NASA, NGA, USGS, FEMA, Esri, HERE, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA
 Additional Source(s): Bowen National Research

6. COMMUTING PATTERNS

Based on the American Community Survey (2015-2019), the following is a distribution of commuting patterns for Site PMA workers age 16 and over:

Mode of Transportation	Workers Age 16+	
	Number	Percent
Drove Alone	14,486	87.2%
Carpooled	1,146	6.9%
Public Transit	13	0.1%
Walked	507	3.1%
Other Means	159	1.0%
Worked at Home	305	1.8%
Total	16,616	100.0%

Source: American Community Survey (2015-2019); ESRI; Urban Decision Group; Bowen National Research

Over 87% of all workers drove alone, 6.9% carpooled and only 0.08% used public transportation.

Typical travel times to work for the Site PMA residents are illustrated as follows:

Travel Time	Workers Age 16+	
	Number	Percent
Less Than 15 Minutes	4,942	29.7%
15 to 29 Minutes	5,765	34.7%
30 to 44 Minutes	2,718	16.4%
45 to 59 Minutes	1,467	8.8%
60 or More Minutes	1,419	8.5%
Worked at Home	305	1.8%
Total	16,616	100.0%

Source: American Community Survey (2015-2019); ESRI; Urban Decision Group; Bowen National Research

The largest share of area commuters has typical travel times to work ranging from 15 to 29 minutes. The subject site is within a 15-minute drive to most of the area's largest employers, which should continue to contribute to its marketability. A drive-time map for the subject site is on the following page.



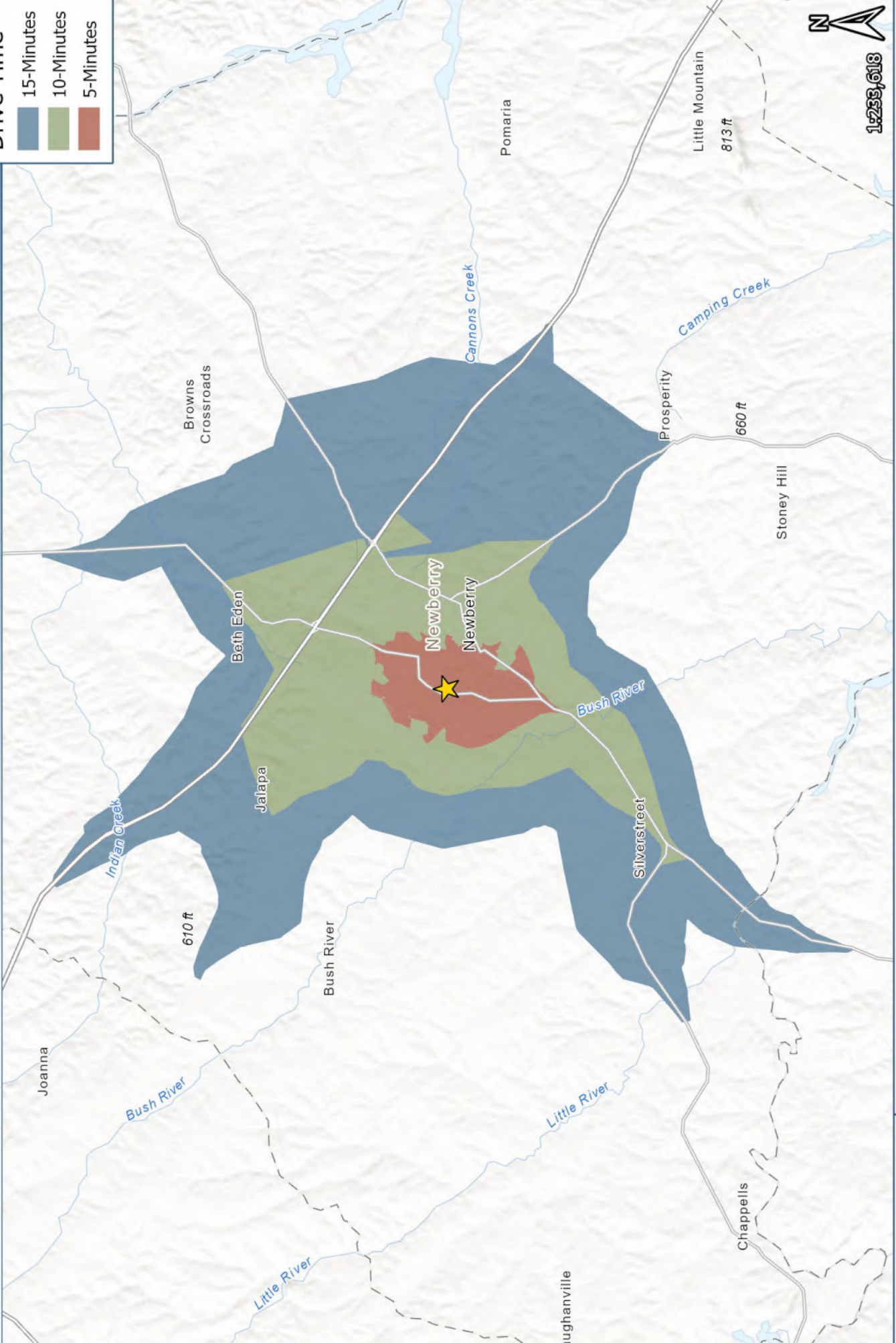
Drive Time from Site

Newberry, SC



Drive-Time

- 15-Minutes
- 10-Minutes
- 5-Minutes



1:253,618

Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, Esri, CGIAR, USGS
Additional Source(s): Bowen National Research



0 1 2 3 4 Miles

7. ECONOMIC FORECAST AND HOUSING IMPACT

Based on data provided by the State of South Carolina Department of Labor, the local economy generally experienced growth between 2012 and 2019. However, beginning in 2020, the area was negatively impacted by the COVID-19 pandemic, which caused many area businesses to shut down in an attempt to mitigate the spread of the coronavirus. During this time, the Newberry County employment base declined over 260 jobs, or 1.4%, and its unemployment rate increased by over two percentage points. Specifically, between February and April 2020, the unemployment rate within the county spiked by over five percentage points. On a positive note, the local economy has improved thus far in 2022 (through March), as the employment base experienced growth and the unemployment rate has declined. Nonetheless, several of the businesses impacted include those within the Retail Trade and Accommodation & Food Services sectors, which account for over 19.0% of the market's labor force and provide lower wage paying positions. The subject site will continue to provide a good quality affordable housing option in an economy where lower-wage employees are most vulnerable.

F. Community Demographic Data

The following demographic data relates to the Site PMA. It is important to note that not all 2024 projections quoted in this section agree because of the variety of sources and rounding methods used. In most cases, the differences in the 2024 projections do not vary more than 1.0%.

1. POPULATION TRENDS

a. Total Population

The Site PMA population bases for 2000, 2010, 2021 (estimated) and 2024 (projected) are summarized as follows:

	Year			
	2000 (Census)	2010 (Census)	2021 (Estimated)	2024 (Projected)
Population	36,108	37,508	38,853	39,338
Population Change	-	1,400	1,345	485
Percent Change	-	3.9%	3.6%	1.2%

Source: 2000, 2010 Census; ESRI; Urban Decision Group; Bowen National Research

The Newberry Site PMA population base increased by 1,400 between 2000 and 2010. This represents a 3.9% increase from the 2000 population base, or an annual rate of 0.4%. Between 2010 and 2021, the population increased by 1,345, or 3.6%. It is projected that the population will increase by 485, or 1.2%, between 2021 and 2024.

Based on the 2010 Census, the population residing in group-quarters is represented by 3.4% of the Site PMA population, as demonstrated in the following table:

	Number	Percent
Population in Group Quarters	1,291	3.4%
Population not in Group Quarters	36,217	96.6%
Total Population	37,508	100.0%

Source: 2010 Census

b. Population by Age Group

The Site PMA population bases by age are summarized as follows:

Population by Age	2010 (Census)		2021 (Estimated)		2024 (Projected)		Change 2021-2024	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
19 & Under	9,785	26.1%	9,222	23.7%	9,400	23.9%	178	1.9%
20 to 24	2,507	6.7%	2,288	5.9%	2,239	5.7%	-49	-2.1%
25 to 34	4,191	11.2%	4,713	12.1%	4,368	11.1%	-345	-7.3%
35 to 44	4,598	12.3%	4,508	11.6%	4,688	11.9%	180	4.0%
45 to 54	5,368	14.3%	4,628	11.9%	4,653	11.8%	25	0.5%
55 to 64	5,100	13.6%	5,576	14.4%	5,430	13.8%	-146	-2.6%
65 to 74	3,372	9.0%	4,814	12.4%	5,008	12.7%	194	4.0%
75 & Over	2,587	6.9%	3,104	8.0%	3,552	9.0%	448	14.4%
Total	37,508	100.0%	38,853	100.0%	39,338	100.0%	485	1.2%

Source: 2010 Census; ESRI; Urban Decision Group; Bowen National Research

As the preceding table illustrates, approximately 50% of the population is expected to be between 25 and 64 years old in 2021. This age group is the primary group of continued and potential support for the subject site and likely represents a significant number of the tenants.

c. Elderly and Non-Elderly Population

The subject project is not age-restricted; therefore, all persons with appropriate incomes will be eligible to live at the subject development. As a result, we have not included an analysis of the PMA’s senior and non-senior population.

d. Special Needs Population

The subject project will not offer special needs units. Therefore, we have not provided any population data regarding special needs populations.

2. HOUSEHOLD TRENDS

a. Total Households

Household trends within the Newberry Site PMA are summarized as follows:

	Year			
	2000 (Census)	2010 (Census)	2021 (Estimated)	2024 (Projected)
Households	14,026	14,709	15,365	15,592
Household Change	-	683	656	227
Percent Change	-	4.9%	4.5%	1.5%
Household Size	2.57	2.55	2.44	2.44

Source: 2000, 2010 Census; ESRI; Urban Decision Group; Bowen National Research

Within the Newberry Site PMA, households increased by 683 (4.9%) between 2000 and 2010. Between 2010 and 2021, households increased by 656, or 4.5%. By 2024, there will be 15,592 households, an increase of 227 households, or 1.5%, from 2021. This is an increase of approximately 76 households annually over the next three years.

The Site PMA household bases by age are summarized as follows:

Households by Age	2010 (Census)		2021 (Estimated)		2024 (Projected)		Change 2021-2024	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Under 25	615	4.2%	499	3.2%	511	3.3%	12	2.4%
25 to 34	1,776	12.1%	1,937	12.6%	1,788	11.5%	-149	-7.7%
35 to 44	2,403	16.3%	2,269	14.8%	2,352	15.1%	83	3.7%
45 to 54	2,941	20.0%	2,438	15.9%	2,439	15.6%	1	0.0%
55 to 64	3,028	20.6%	3,194	20.8%	3,088	19.8%	-106	-3.3%
65 to 74	2,177	14.8%	2,994	19.5%	3,095	19.9%	101	3.4%
75 to 84	1,224	8.3%	1,359	8.8%	1,549	9.9%	190	14.0%
85 & Over	545	3.7%	675	4.4%	769	4.9%	94	14.0%
Total	14,709	100.0%	15,365	100.0%	15,592	100.0%	227	1.5%

Source: 2010 Census; ESRI; Urban Decision Group; Bowen National Research

Between 2021 and 2024, the greatest growth among household age groups is projected to be among those ages 65 and older. While those under the age of 65 are projected to decline overall during the same time frame, they will still represent over 65.0% of all households within the market in 2024. As such, there will continue to be a larger base of age-appropriate households within the Site PMA to support the subject project.

b. Households by Tenure

Households by tenure are distributed as follows:

Tenure	2010 (Census)		2021 (Estimated)		2024 (Projected)	
	Number	Percent	Number	Percent	Number	Percent
Owner-Occupied	10,667	72.5%	11,093	72.2%	11,344	72.8%
Renter-Occupied	4,042	27.5%	4,272	27.8%	4,248	27.2%
Total	14,709	100.0%	15,365	100.0%	15,592	100.0%

Source: 2010 Census; ESRI; Urban Decision Group; Bowen National Research

In 2021, homeowners occupied 72.2% of all occupied housing units, while the remaining 27.8% were occupied by renters. The share of renters is considered typical for a rural market, such as the Newberry Site PMA, and the 4,272 renter households estimated in 2021 represent a good base of continued support for the subject project.

c. Households by Income

The distribution of households by income within the Newberry Site PMA is summarized as follows:

Household Income	2010 (Census)		2021 (Estimated)		2024 (Projected)	
	Households	Percent	Households	Percent	Households	Percent
Less Than \$10,000	1,348	9.2%	1,166	7.6%	1,100	7.1%
\$10,000 to \$19,999	2,131	14.5%	1,695	11.0%	1,625	10.4%
\$20,000 to \$29,999	1,924	13.1%	1,869	12.2%	1,768	11.3%
\$30,000 to \$39,999	1,687	11.5%	1,669	10.9%	1,610	10.3%
\$40,000 to \$49,999	1,740	11.8%	1,320	8.6%	1,336	8.6%
\$50,000 to \$59,999	1,123	7.6%	1,510	9.8%	1,508	9.7%
\$60,000 to \$74,999	1,239	8.4%	1,706	11.1%	1,785	11.4%
\$75,000 to \$99,999	1,684	11.4%	1,234	8.0%	1,319	8.5%
\$100,000 to \$124,999	1,043	7.1%	1,372	8.9%	1,508	9.7%
\$125,000 to \$149,999	423	2.9%	718	4.7%	784	5.0%
\$150,000 to \$199,999	313	2.1%	667	4.3%	768	4.9%
\$200,000 & Over	54	0.4%	439	2.9%	482	3.1%
Total	14,709	100.0%	15,365	100.0%	15,594	100.0%
Median Income	\$41,520		\$49,723		\$52,368	

Source: 2010 Census; ESRI; Urban Decision Group; Bowen National Research

In 2010, the median household income was \$41,520. This increased by 19.8% to \$49,723 in 2021. By 2024, it is projected that the median household income will be \$52,368, an increase of 5.3% from 2021.

d. Average Household Size

Information regarding average household size is considered in 2. a. *Total Households* of this section.

e. Households by Income by Tenure

The following tables illustrate renter household income by household size for 2010, 2021 and 2024 for the Newberry Site PMA:

Renter Households	2010 (Census)					
	1-Person	2-Person	3-Person	4-Person	5-Person+	Total
Less Than \$10,000	231	179	123	86	58	678
\$10,000 to \$19,999	391	225	155	108	73	953
\$20,000 to \$29,999	277	184	127	89	60	737
\$30,000 to \$39,999	189	143	99	69	47	547
\$40,000 to \$49,999	149	122	84	59	40	454
\$50,000 to \$59,999	57	49	34	24	16	180
\$60,000 to \$74,999	63	55	38	26	18	199
\$75,000 to \$99,999	60	49	34	24	16	182
\$100,000 to \$124,999	23	21	14	10	7	74
\$125,000 to \$149,999	10	8	6	4	3	30
\$150,000 to \$199,999	2	2	1	1	1	7
\$200,000 & Over	0	0	0	0	0	1
Total	1,453	1,038	715	500	338	4,042

Source: ESRI; Urban Decision Group

Renter Households	2021 (Estimated)					
	1-Person	2-Person	3-Person	4-Person	5-Person+	Total
Less Than \$10,000	249	156	93	54	50	602
\$10,000 to \$19,999	388	179	106	62	58	792
\$20,000 to \$29,999	348	172	102	59	56	737
\$30,000 to \$39,999	251	137	81	47	44	561
\$40,000 to \$49,999	169	95	56	33	31	384
\$50,000 to \$59,999	132	86	51	30	28	327
\$60,000 to \$74,999	148	98	58	34	32	370
\$75,000 to \$99,999	78	52	31	18	17	195
\$100,000 to \$124,999	61	39	23	13	13	149
\$125,000 to \$149,999	31	21	12	7	7	78
\$150,000 to \$199,999	19	12	7	4	4	47
\$200,000 & Over	13	8	5	3	2	31
Total	1,886	1,056	625	364	341	4,272

Source: ESRI; Urban Decision Group

Renter Households	2024 (Projected)					
	1-Person	2-Person	3-Person	4-Person	5-Person+	Total
Less Than \$10,000	236	145	85	49	47	562
\$10,000 to \$19,999	380	168	97	56	54	756
\$20,000 to \$29,999	342	160	93	54	51	699
\$30,000 to \$39,999	247	130	76	44	42	539
\$40,000 to \$49,999	170	92	53	31	30	376
\$50,000 to \$59,999	145	89	52	30	29	346
\$60,000 to \$74,999	173	106	61	36	34	410
\$75,000 to \$99,999	83	53	31	18	17	201
\$100,000 to \$124,999	70	42	24	14	13	164
\$125,000 to \$149,999	35	22	13	8	7	85
\$150,000 to \$199,999	28	18	10	6	6	69
\$200,000 & Over	19	10	6	4	3	43
Total	1,929	1,035	602	349	333	4,248

Source: ESRI; Urban Decision Group

Demographic Summary

Over a quarter of the market is occupied by renter households. Overall, population and household trends have been increasing since 2000 and are projected to remain positive through 2024, increasing by 485 (1.2%) and 227 (1.5%) from 2021, respectively. While senior households ages 65 and older are projected to encompass most of this projected growth, over 65.0% of all households are projected to be under the age of 65 in 2024. This demonstrates that a large number of age-appropriate households will continue to be present within the Site PMA to support the subject project. As discussed later in Section H of this report, all of the affordable rental communities surveyed in the market are performing at high occupancy levels. This indicates that high demand exists for such housing and the continuing need for additional affordable housing options within the Site PMA, particularly when factoring in rent overburdened households or those living in substandard housing.

G. Project-Specific Demand Analysis

1. INCOME RESTRICTIONS

The number of income-eligible households necessary to support the project from the Site PMA is an important consideration in evaluating the subject project's continued potential.

Under the Low-Income Housing Tax Credit (LIHTC) program, household eligibility is based on household income not exceeding the targeted percentage of Area Median Household Income (AMHI), depending upon household size.

The subject site is within Newberry County, South Carolina, which has a four-person median household income of \$65,000 for 2022. The project location, however, is eligible for the National Non-Metropolitan Income and Rent Floor adjustment. Therefore, the income restrictions for the subject project are based on the national non-metropolitan four-person median household income of \$71,300 in 2022. The subject property will continue to be restricted to households with incomes up to 50% and 60% of AMHI. The following table summarizes the maximum allowable income by household size:

Household Size	Maximum Allowable Income	
	50%	60%
One-Person	\$24,950	\$29,940
Two-Person	\$28,500	\$34,200
Three-Person	\$32,100	\$38,520
Four-Person	\$35,650	\$42,780
Five-Person	\$38,500	\$46,200

The largest units (three-bedroom) at the subject site are expected to continue to generally house up to five-person households. As such, the maximum allowable income at the subject site is **\$46,200**.

2. AFFORDABILITY

Leasing industry standards typically require households to have rent-to-income ratios of 25% to 30%. Pursuant to South Carolina (SC) Housing market study guidelines, the maximum rent-to-income ratio permitted for a family project is 35% and for a senior project is 40%.

The subject LIHTC units will have a lowest gross rent of \$535. Over a 12-month period, the minimum annual household expenditure (rent plus tenant-paid utilities) at the subject site is \$6,420. Applying a 35% rent-to-income ratio to the minimum annual household expenditure yields a minimum annual household income requirement for the Tax Credit units of **\$18,343**.

Based on the preceding analyses, the income-appropriate ranges required for residency at the subject project with units renovated to serve households at 50% and 60% of AMHI are included in the following table:

Unit Type	Income Range	
	Minimum	Maximum
Tax Credit (Limited To 50% Of AMHI)	\$18,343	\$38,500
Tax Credit (Limited To 60% Of AMHI)	\$20,914	\$46,200
Overall Project	\$18,343	\$46,200

3. DEMAND COMPONENTS

The following are the demand components as outlined by the SC Housing:

- a. **Demand for New Households.** *New units required in the market area due to projected household growth should be determined using 2021 Census data estimates and projecting forward to the anticipated placed-in-service date of the project (2024) using a growth rate established from a reputable source such as ESRI. The population projected must be limited to the age and income cohort and the demand for each income group targeted (i.e. 50% of median income) must be shown separately.*

In instances where a significant number (more than 20%) of proposed rental units are comprised of three- and/or four-bedroom units, analysts must conduct the required capture rate analysis, followed by an additional refined overall capture rate analysis for the proposed three- and/or four-bedroom units by considering only the number of large households (generally three- or four+-persons). A demand analysis which does not consider both the overall capture rate and the additional refined larger-households analysis may not accurately illustrate the demographic support base.

- b. **Demand from Existing Households:** *The second source of demand should be determined using 2000 and 2010 Census data (as available), ACS 5 year estimates or demographic estimates provided by reputable companies. All data in tables should be projected from the same source:*

- 1) **Rent overburdened households, if any, within the age group, income cohorts and tenure (renters) targeted for the subject development.** *In order to achieve consistency in methodology, all analysts should assume that the rent-overburdened analysis includes households paying greater than 35%, or in the case of elderly 40%, of their gross income toward gross rent rather than some greater percentage. If an analyst feels strongly that the rent-overburdened analysis should focus on a greater percentage, they must give an in-depth explanation why this assumption should be included. Any such additional indicators should be calculated separately and be easily added or subtracted from the required demand analysis.*

Based on Table B25074 of the American Community Survey (ACS) 2015-2019 5-year estimates, approximately 40.4% to 50.3% (depending on targeted income level) of renter households within the market were rent overburdened. These households have been included in our demand analysis.

- 2) **Households living in substandard housing (units that lack complete plumbing or those that are overcrowded).** *Households in substandard housing should be adjusted for age, income bands and tenure that apply. The analyst should use their own knowledge of the market area and project to determine if households from substandard housing would be a realistic source of demand. The market analyst is encouraged to be conservative in their estimate of demand from both households that are rent-overburdened and/or living in substandard housing.*

Based on the 2019 ACS 5-Year Estimates Table B25016, 7.1% of all households within the market were living in substandard housing (lacking complete indoor plumbing and overcrowded households/1+ persons per room).

- 3) **Elderly Homeowners likely to convert to rentership:** *The Authority recognizes that this type of turnover is increasingly becoming a factor in the demand for elderly Tax Credit housing. A narrative of the steps taken to arrive at this demand figure should be included. The elderly homeowner conversion demand component shall not account for more than 20% of the total demand.*
- 4) **Other:** *Please note, the Authority does not, in general, consider household turnover rates other than those of elderly to be an accurate determination of market demand. However, if an analyst firmly believes that demand exists which is not being captured by the above methods, she/he may be allowed to consider this information in their analysis. The analyst may also use other indicators to estimate demand if they can be fully justified (e.g. an analysis of an under-built or over-built market in the base year). Any such additional indicators should be calculated separately and be easily added or subtracted from the demand analysis described above.*

4. METHODOLOGY

Please note that the Authority’s stabilized level of occupancy is 93.0%

- a. **Demand:** The two overall demand components (3a and 3b) added together represent total demand for the project.
- b. **Supply:** Comparable/competitive units funded, under construction, or placed in service since 2021 must be subtracted to calculate net demand. Vacancies in projects placed in service prior to 2021 which have not reach stabilized occupancy must also be considered as part of the supply.
- c. **Capture Rates:** Capture rates must be calculated for each targeted income group and each bedroom size proposed as well as for the project overall.
- d. **Absorption Rates:** The absorption rate determination should consider such factors as the overall estimate of new renter household growth, the available supply of comparable/competitive units, observed trends in absorption of comparable/competitive units, and the availability of subsidies and rent specials.

5. DEMAND/CAPTURE RATE CALCULATIONS

Within the Site PMA, there are no comparable affordable housing projects that were funded and/or built during the projection period (2021 to current). In addition, all existing comparable LIHTC rental properties surveyed within the market are occupied. Therefore, we did not utilize any existing units in the demand analysis illustrated in the following table:

Demand Component	Percent Of Median Household Income		
	50% AMHI (\$18,343-\$38,500)	60% AMHI (\$20,914-\$46,200)	Overall (\$18,343-\$46,200)
Demand from New Renter Households (Income-Appropriate)	1,307 - 1,345 = -38	1,432 - 1,469 = -37	1,625 - 1,667 = -42
+			
Demand from Existing Households (Rent Overburdened)	1,345 X 50.3% = 676	1,469 X 40.4% = 593	1,667 X 42.2% = 703
+			
Demand from Existing Households (Renters in Substandard Housing)	1,345 X 7.1% = 95	1,469 X 7.1% = 104	1,667 X 7.1% = 118
+			
Demand from Existing Households (Senior Homeowner Conversion)	N/A		
=			
Total Demand	733	660	779
-			
Supply (Directly Comparable Units Built and/or Funded Since 2021)	0	0	0
=			
Net Demand	733	660	779
Subject Units	12	36	48
Subject Units / Net Demand	12 / 733	36 / 660	48 / 779
Capture Rate	= 1.6%	= 5.5%	= 6.2%

N/A – Not Applicable

The capture rates for units targeting households at 50% and 60% of AMHI of 1.6% and 5.5%, respectively, are considered very low and easily achievable. This is especially true, considering the lack of available affordable units identified within the Site PMA. The overall capture rate for the subject project is also very low and easily achievable at 6.2%, demonstrating that there will continue to be a significant base of income-qualified renter households that will be able to support the subject project. Note that as all tenants are expected to remain at the site post renovations, especially considering that most rents will either decrease or remain relatively stable, the subject's effective capture rate is **0.0%**.

Based on the distribution of persons per household and the share of rental units in the market, we estimate the share of demand by bedroom type within the Site PMA as follows:

Estimated Demand by Bedroom	
Bedroom Type	Percent
One-Bedroom	25.0%
Two-Bedroom	50.0%
Three-Bedroom	25.0%
Total	100.0%

Applying the preceding shares to the income-qualified renter households yields demand and capture rates of the proposed units by bedroom type as illustrated in the following tables:

Units Targeting 50% Of AMHI (733 Units of Demand)					
Bedroom Size (Share of Demand)	Total Demand	Supply*	Net Demand by Bedroom Type	Subject Units	Capture Rate by Bedroom Type
One-Bedroom (25%)	183	0	183	4	2.2%
Two-Bedroom (50%)	367	0	367	4	1.1%
Three-Bedroom (25%)	183	0	183	4	2.2%

*Directly comparable units built and/or funded in the project market over the projection period.

Units Targeting 60% Of AMHI (660 Units of Demand)					
Bedroom Size (Share of Demand)	Total Demand	Supply*	Net Demand by Bedroom Type	Subject Units	Capture Rate by Bedroom Type
One-Bedroom (25%)	165	0	165	8	4.8%
Two-Bedroom (50%)	330	0	330	20	6.1%
Three-Bedroom (25%)	165	0	165	8	4.8%

*Directly comparable units built and/or funded in the project market over the projection period.

The subject project's capture rates by bedroom type and targeted income level range from 1.1% to 6.1%, which are considered very low and easily achievable. This is especially true, considering that the subject project is fully occupied with an extensive waiting list.

Considering that the subject project includes 12 three-bedroom units, which comprise 25.0% of all subject units offered, the following analysis has been conducted to consider only large-households (three-person+) and the subject's three-bedroom units.

Demand Component	Percent Of Median Household Income		
	50% AMHI (\$25,817-\$38,500)	60% AMHI (\$30,103-\$46,200)	Overall (\$25,817-\$46,200)
Demand from New Larger Renter Households (Income-Appropriate)	221 - 238 = -17	231 - 245 = -14	315 - 338 = -23
+			
Demand from Existing Households (Rent Overburdened)	238 X 50.3% = 120	245 X 40.4% = 99	338 X 42.2% = 143
+			
Demand from Existing Households (Renters in Substandard Housing)	238 X 7.1% = 17	245 X 7.1% = 17	338 X 7.1% = 24
=			
Total Large Household Demand	120	102	144
-			
Supply (Directly Comparable (Three-Br.+) Units Built and/or Funded Since 2021)	0	0	0
=			
Net Large Household Demand			
Subject (Three-Br.+) Units/ Net Large Household Demand	4 / 120	8 / 102	12 / 144
Large-Household Capture Rate	= 3.3%	= 7.8%	= 8.3%

The capture rates for the subject's three-bedroom units targeting households at 50% and 60% of AMHI of 3.3% and 7.8%, respectively, when considering larger (three-person+) household sizes, are considered very low and easily achievable. This is especially true, considering the lack of available affordable three-bedroom units within the Site PMA. The overall capture rate for the subject project's three-bedroom units is also very low and easily achievable at 8.3%, demonstrating that there is a significant base of income-qualified renter households that will be able to support such units. It is important to note that the net demand for the subject's three-bedroom units in the preceding table differs from the net demand by bedroom type on the preceding page. The analysis in the preceding table considers all larger household sizes that will income-qualify to reside at the subject's three-bedroom units, regardless of bedroom type preference.

6. ABSORPTION PROJECTIONS

All 48 subject units are occupied with the project maintaining a waiting list of 70 households for the next available unit. It is important to note that the renovations at the subject site will not necessitate the displacement of current residents. As a result, it is anticipated that none, or very few, of the current tenants will move from the project during or following renovations. Therefore, few if any of the subject units will have to be re-rented immediately following renovations. However, for the purposes of this analysis, we assume that all 48 subject units will be vacated and that all units will have to be re-rented post renovations. We also assume the absorption period at the site begins as soon as the first renovated units are available for occupancy and that initial renovated units at the site will be available for rent in October 2023, though the actual completion time may be earlier.

It is our opinion that the 48 units at the subject site will reach a stabilized occupancy of 93.0% within approximately three months following renovations, assuming total displacement of existing tenants. This absorption period is based on an average absorption rate of approximately 15 units per month. Our absorption projections assume that no other projects targeting a similar income group will be developed during the projection period and that the renovations will be completed as outlined in this report.

In reality, the absorption period for this project will be less than one month, as most tenants are expected to remain at the project.

H. Rental Housing Analysis (Supply)

1. COMPETITIVE DEVELOPMENTS

Excluding the subject project, we identified and surveyed two non-subsidized family (general-occupancy) Low-Income Housing Tax Credit (LIHTC) properties within the Newberry Site PMA. These properties target households earning up to 50% and/or 60% of Area Median Household Income (AMHI); therefore, they are considered competitive with the subject development. Given the limited amount of non-subsidized LIHTC product within the market, we also identified and surveyed two LIHTC projects outside of the market but within the region in Clinton and Winnsboro. Note that these two projects outside of the market are not competitive with the subject development, as they derive demographic support from a different geographical region. These two projects outside of the market were selected for comparability purposes only. The four comparable LIHTC projects and the subject development are summarized in the following table:

Map I.D.	Project Name	Year Built/Renovated	Total Units	Occ. Rate	Distance to Site	Waiting List	Target Market
Site	Palmetto Pointe Apartments	2006 / 2023	48	100.0%	-	70 HH	Families; 50% & 60% AMHI
9	Newberry Green Apts.	2007	44	100.0%	2.4 Miles	15 HH	Families; 50% AMHI
11	Pebblebrook Apts.	2013	48	100.0%	4.6 Miles	6 Months	Families; 50% & 60% AMHI
903	Clinton Green	2010	40	100.0%	22.1 Miles	8 HH	Families; 50% & 60% AMHI
905	Deer Wood Apts.	1997 / 2016	72	100.0%	38.1 Miles	11 HH	Families; 50% & 60% AMHI

900 series Map IDs are located outside the Site PMA

OCC. – Occupancy

HH - Households

The four LIHTC projects have a combined occupancy rate of 100.0%, all of which maintain waiting lists, illustrating that pent-up demand exists for additional affordable rental housing within the market and region. The subject project will continue to accommodate a portion of this unmet demand.

The gross rents for the competing/comparable projects and the proposed rents at the subject site, as well as their unit mixes and vacancies by bedroom are listed in the following table:

Map I.D.	Project Name	Gross Rent/Percent of AMHI (Number of Units/Vacancies)			Rent Special
		One-Br.	Two-Br.	Three-Br.	
Site	Palmetto Pointe Apartments	\$535/50% (4) \$610/60% (8)	\$625/50% (4) \$745/60% (20)	\$753/50% (4) \$878/60% (8)	-
9	Newberry Green Apts.	\$571/50% (4/0)	\$639/50% (28/0)	\$739/50% (12/0)	None
11	Pebblebrook Apts.	-	\$730/50% (6/0) \$875/60% (20/0)	\$805/50% (6/0) \$965/60% (16/0)	None
903	Clinton Green	-	\$623/50% (24/0) \$738/60% (6/0)	\$715/50% (6/0) \$825/60% (4/0)	None
905	Deer Wood Apts.	\$599/50% (3/0) \$599/60% (9/0)	\$683/50% (6/0) \$683/60% (18/0)	\$760/50% (9/0) \$760/60% (27/0)	None

900 series Map IDs are located outside the Site PMA

The proposed subject rents, ranging from \$535 to \$878, will be within the range of LIHTC rents offered at the comparable properties for similar unit types. In fact, the proposed subject rents will continue to be some of the lowest LIHTC rents for similar unit types within the *market*. This will continue to position the subject at a competitive advantage.

The following table identifies the comparable LIHTC properties that accept Housing Choice Vouchers, as well as the approximate number of units occupied by residents utilizing Housing Choice Vouchers:

Map I.D.	Project Name	Total Units	Number of Vouchers	Share of Vouchers
9	Newberry Green Apts.	44	3	6.8%
11	Pebblebrook Apts.	48	6	12.5%
903	Clinton Green	40	8	20.0%
905	Deer Wood Apts.	72	20	27.8%
Total		204	37	18.1%

900 series Map IDs are located outside the Site PMA

As the preceding table illustrates, there are a total of approximately 37 units that are occupied by Voucher holders among the four comparable LIHTC projects. The 37 units occupied by Voucher holders comprise 18.1% of these comparable units. This illustrates that nearly 82.0% of these comparable Tax Credit units are occupied by tenants which are not currently receiving rental assistance. Therefore, the gross rents charged at the aforementioned projects in the market are achievable.

One-page summary sheets, including property photographs of each comparable Tax Credit property, are included on the following pages.

9 Newberry Green Apts. 2.4 miles to site



Address: 411 Monroe St., Newberry, SC 29108
 Phone: (803) 276-0064 Contact: Ranzella Wright (By Phone)
 Property Type: Tax Credit
 Target Population: Family
 Total Units: 44 Year Built: 2007
 Vacant Units: 0 *AR Year:
 Occupancy: 100.0% Yr Renovated:
 Turnover: Stories: 2
 Waitlist: 15 HH
 Rent Special: None
 Ratings
 Quality: B
 Neighborhood: B
 Access/Visibility: B/B

Notes: Tax Credit

Features And Utilities

Utility Schedule Provided by: Newberry Housing Authority
 Utility Type & Responsibility: Landlord pays Trash

Unit Amenities: Dishwasher; Disposal; Microwave; Range; Refrigerator; Central AC; Ceiling Fan; W/D Hookup; Window Treatments; Flooring (Carpet, Composite/Vinyl/Laminate)

Property Amenities: Laundry Room; On-Site Management; Recreation Areas (Playground)

Parking Type: Surface Lot

Unit Configuration

Beds	Baths	Type	Units	Vacant	Sq Ft	\$/ Sq Ft	Collected Rent	AMHI
1	1	G	4	0	714	\$0.55	\$390	50%
2	2	G	28	0	954	\$0.45	\$429	50%
3	2	G	12	0	1,107	\$0.45	\$494	50%

*Adaptive Reuse

*DTS is based on drive time

11 Pebblebrook Apts. 4.6 miles to site



Address: 5000 Pebblebrook Dr., Newberry, SC 29108

Phone: (803) 251-9075

Contact: Kymberly (By Phone)

Property Type: Tax Credit

Target Population: Family

Total Units: 48

Year Built: 2013

Vacant Units: 0

*AR Year:

Occupancy: 100.0%

Yr Renovated:

Turnover:

Stories: 3

Waitlist: 6 mos

Rent Special: None

Ratings

Quality: B+

Neighborhood: B

Access/Visibility: A/A

Notes: Tax Credit



Features And Utilities

Utility Schedule Provided by: Newberry Housing Authority

Utility Type & Responsibility: Landlord pays Trash

Unit Amenities: Dishwasher; Disposal; Icemaker; Microwave; Range; Refrigerator; Central AC; Ceiling Fan; W/D Hookup; Window Treatments; Flooring (Carpet, Composite/Vinyl/Laminate)

Property Amenities: Laundry Room; On-Site Management; Recreation Areas (Grilling Area, Playground); CCTV; Extra Storage

Parking Type: Surface Lot

Unit Configuration

Beds	Baths	Type	Units	Vacant	Sq Ft	\$/ Sq Ft	Collected Rent	AMHI
2	2	G	6	0	1,100	\$0.47	\$520	50%
2	2	G	20	0	1,250	\$0.53	\$665	60%
3	2	G	6	0	1,100	\$0.51	\$560	50%
3	2	G	16	0	1,250	\$0.58	\$720	60%

*Adaptive Reuse

*DTS is based on drive time

903 Clinton Green **22.1 miles to site**



Address: 100 Houser Cir., Clinton, SC 29325
 Phone: (864) 547-1662 Contact: Sylvia (By Phone)
 Property Type: Tax Credit
 Target Population: Family
 Total Units: 40 Year Built: 2010
 Vacant Units: 0 *AR Year:
 Occupancy: 100.0% Yr Renovated:
 Turnover: Stories: 2
 Waitlist: 8 HH
 Rent Special: None

Ratings
 Quality: B
 Neighborhood: B
 Access/Visibility: B+/B+

Notes: Tax Credit



Features And Utilities

Utility Schedule Provided by: Newberry Housing Authority

Utility Type & Responsibility: Landlord pays Trash

Unit Amenities: Dishwasher; Disposal; Range; Refrigerator; Central AC; Ceiling Fan; W/D Hookup; Window Treatments; Flooring (Carpet, Composite/Vinyl/Laminate)

Property Amenities: Clubhouse/Community Room; Laundry Room; On-Site Management; Recreation Areas (Playground); Extra Storage

Parking Type: Surface Lot

Unit Configuration

Beds	Baths	Type	Units	Vacant	Sq Ft	\$/ Sq Ft	Collected Rent	AMHI
2	1	G	24	0	887	\$0.47	\$413	50%
2	1	G	6	0	887	\$0.60	\$528	60%
3	2	G	6	0	1,094	\$0.43	\$470	50%
3	2	G	4	0	1,094	\$0.53	\$580	60%

*Adaptive Reuse

*DTS is based on drive time

905 Deer Wood Apts. 38.1 miles to site



Address: 647 U.S. Hwy. 321 Bypass So., Winnsboro, SC 29180
 Phone: (803) 712-9098 Contact: Shannon (By Phone)
 Property Type: Tax Credit
 Target Population: Family
 Total Units: 72 Year Built: 1997
 Vacant Units: 0 *AR Year: Ratings
 Occupancy: 100.0% Yr Renovated: 2016 Quality: B-
 Turnover: Stories: 2 Neighborhood: B
 Waitlist: 11 HH Access/Visibility: B/B-
 Rent Special: None
 Notes: Tax Credit

Features And Utilities

Utility Schedule Provided by: Newberry Housing Authority
 Utility Type & Responsibility: Landlord pays Water, Sewer, Trash
 Unit Amenities: Dishwasher; Disposal; Icemaker; Microwave; Range; Refrigerator; Central AC; Controlled Access; W/D Hookup; Window Treatments; Flooring (Carpet, Composite/Vinyl/Laminate)
 Property Amenities: Clubhouse/Community Room; Laundry Room; On-Site Management; Recreation Areas (Playground); CCTV, Courtesy Officer
 Parking Type: Surface Lot

Unit Configuration

Beds	Baths	Type	Units	Vacant	Sq Ft	\$/ Sq Ft	Collected Rent	AMHI
1	1	G	3	0	642	\$0.76	\$490	50%
1	1	G	9	0	642	\$0.76	\$490	60%
2	2	G	6	0	850	\$0.65	\$550	50%
2	2	G	18	0	850	\$0.65	\$550	60%
3	2	G	9	0	1,003	\$0.60	\$600	50%
3	2	G	27	0	1,003	\$0.60	\$600	60%

*Adaptive Reuse

*DTS is based on drive time

The unit sizes (square footage) and number of bathrooms included in each of the different LIHTC unit types offered in the market and region are compared with the subject development in the following tables:

Map I.D.	Project Name	Square Footage		
		One-Br.	Two-Br.	Three-Br.
Site	Palmetto Pointe Apartments	750	947	1,179
9	Newberry Green Apts.	714	954	1,107
11	Pebblebrook Apts.	-	1,100 - 1,250	1,100 - 1,250
903	Clinton Green	-	887	1,094
905	Deer Wood Apts.	642	850	1,003

900 series Map IDs are located outside the Site PMA

Map I.D.	Project Name	Number of Baths		
		One-Br.	Two-Br.	Three-Br.
Site	Palmetto Pointe Apartments	1.0	2.0	2.0
9	Newberry Green Apts.	1.0	2.0	2.0
11	Pebblebrook Apts.	-	2.0	2.0
903	Clinton Green	-	1.0	2.0
905	Deer Wood Apts.	1.0	2.0	2.0

900 series Map IDs are located outside the Site PMA

The subject project will continue to offer some of the largest LIHTC unit sizes (square feet) within the market and region, which will continue to position it at a competitive advantage. The two full bathrooms provided in the two- and three-bedroom units at the subject project will continue to be appealing to the targeted population.

The following tables compare the amenities of the subject development with the selected LIHTC projects in the market and region

Tax Credit Unit Amenities by Map ID						
	Site*	9	11	903	905	
Appliances	Dishwasher	X	X	X	X	X
	Disposal	X	X	X	X	X
	Microwave	X	X	X		X
	Range	X	X	X	X	X
	Refrigerator	X	X	X	X	X
	W/D Hookup	X	X	X	X	X
	W/D					
	No Appliances					
Unit Amenities	AC-Central	X	X	X	X	X
	AC-Other					
	Balcony/ Patio/ Sunroom	X	X	X	X	
	Basement					
	Ceiling Fan	X	X	X	X	
	Controlled Access					X
	E-Call System					
	Furnished					
	Walk-In Closet					
	Window Treatments	X	X	X	X	X
Flooring	Carpet	X	X	X	X	X
	Ceramic Tile					
	Hardwood					
	Finished Concrete					
	Composite/Vinyl/Laminate	X	X	X	X	X
Upgraded	Premium Appliances					
	Premium Countertops					
	Premium Cabinetry					
	Premium Fixtures					
	High/Vaulted Ceilings					
	Oversized Windows					
Parking	Attached Garage					
	Detached Garage					
	Street Parking					
	Surface Lot	X	X	X	X	X
	Carport					
	Property Parking Garage					
	No Provided Parking					

◆ - Senior Property

* Proposed Site(s): Palmetto Pointe Apartments

X = All Units, S = Some Units, O = Optional with Fee

** Details in Comparable Property Profile Report

Continued on Next Page

Tax Credit Property Amenities by Map ID

	Site*	9	11	903	905
		X	X	X	
Community	Multipurpose Room	X	X	X	X
	Chapel				
	Community Kitchen	X			
	Dining Room - Private				
	Dining Room - Public				
	Rooftop Terrace				
	Concierge Service **				
	Convenience Amenities **				
	Covered Outdoor Area **				
	Elevator				
	Laundry Room	X	X	X	X
	On-Site Management	X	X	X	X
	Pet Care **				
Recreation	Basketball				
	Bocce Ball				
	Firepit				
	Fitness Center				
	Grilling Area			X	
	Game Room - Billiards				
	Walking Path				
	Hot Tub				
	Library				
	Media Room / Theater				
	Playground	X	X	X	X
	Putting Green				
	Racquetball				
	Shuffleboard				
	Swimming Pool - Indoor				
	Swimming Pool - Outdoor				
	Tennis				
Volleyball					
Security	CCTV		X		X
	Courtesy Officer				X
	Security Gate				
	Social Services **				
	Storage - Extra	X	X	X	X
	Common Space WiFi	X			

◆ - Senior Property

* Proposed Site(s): Palmetto Pointe Apartments

X = All Units, S = Some Units, O = Optional with Fee

** Details in Comparable Property Profile Report

Post renovations, the subject's amenities package will continue to be very similar with those offered at the comparable LIHTC projects within the market and region. The subject development will not lack any amenity that will have an adverse impact on its continued marketability.

Competitive/Comparable Tax Credit Summary

Based on our analysis of the proposed rents, unit sizes (square footage), amenities, location, quality and occupancy rates of the existing low-income properties within the market, it is our opinion that the subject development will continue to be very marketable. In fact, all comparable LIHTC projects are fully occupied, and the subject project will offer some of the lowest LIHTC rents for similar unit types within the *market*. The aforementioned factors will bode very well in the continued demand of the subject units and have been considered in our absorption estimates.

2. COMPARABLE TAX CREDIT PROPERTIES MAP

A map illustrating the location of the comparable Tax Credit properties we surveyed is on the following page.



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RESEARCH

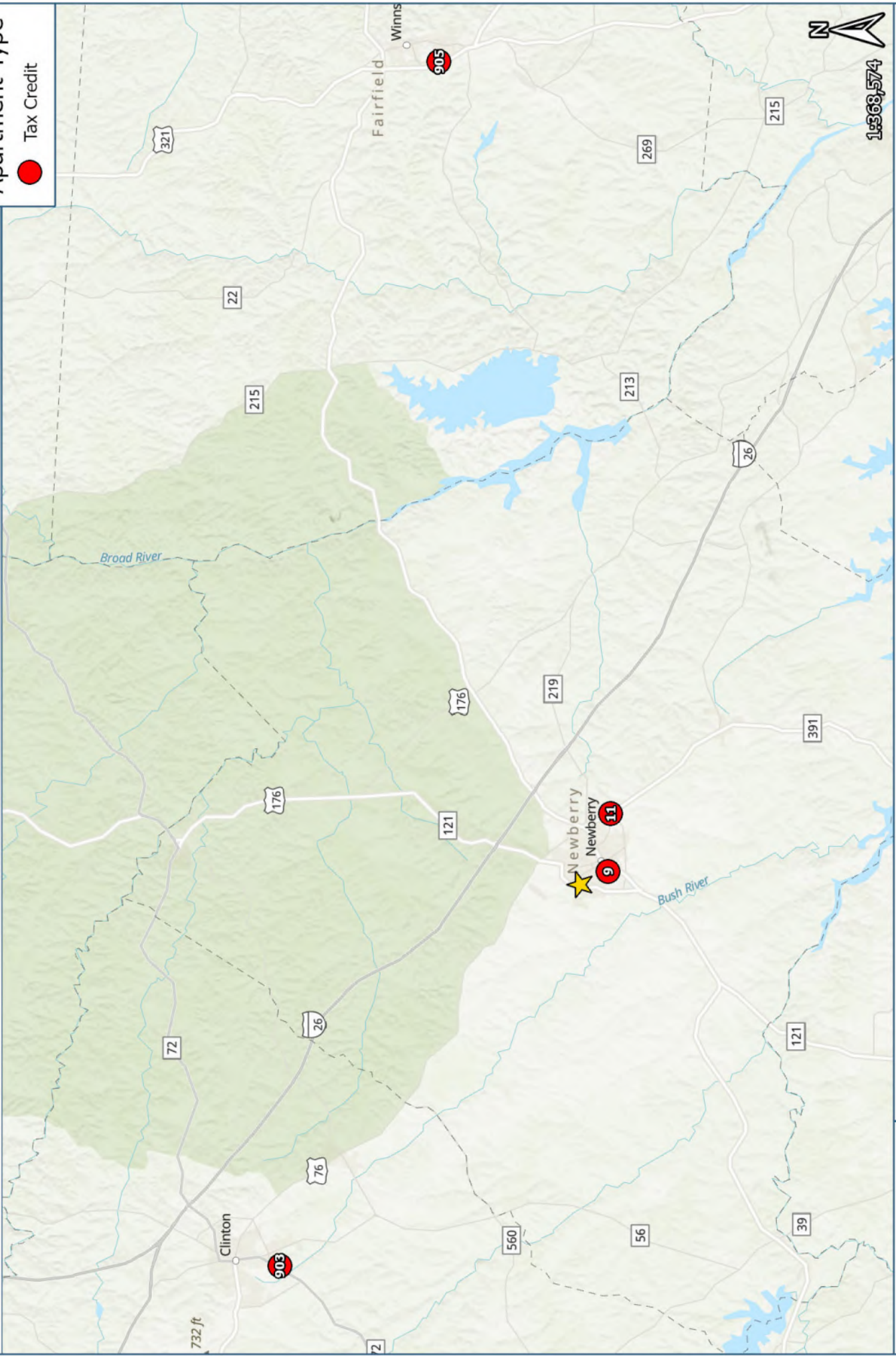
Comparable Tax Credit Property Locations

Newberry, SC

★ Site

Apartment Type

● Tax Credit



Esri, CGIAR, USGS, Esri, HERE, HERE, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS
Additional Source(s): Bowen National Research



3. RENTAL HOUSING OVERVIEW

The distributions of the area housing stock within the Newberry Site PMA in 2010 and 2021 (estimated) are summarized in the following table:

Housing Status	2010 (Census)		2021 (Estimated)	
	Number	Percent	Number	Percent
Total-Occupied	14,709	82.1%	15,365	81.9%
Owner-Occupied	10,667	72.5%	11,093	72.2%
Renter-Occupied	4,042	27.5%	4,272	27.8%
Vacant	3,213	17.9%	3,399	18.1%
Total	17,922	100.0%	18,764	100.0%

Source: 2010 Census; ESRI; Urban Decision Group; Bowen National Research

Based on a 2021 update of the 2010 Census, of the 18,764 total housing units in the market, 18.1% were vacant. In 2021, it was estimated that homeowners occupied 72.2% of all occupied housing units, while the remaining 27.8% were occupied by renters. The share of renters is considered typical for a rural market, such as the Newberry Site PMA, and the 4,272 renter households estimated in 2021 represent a good base of continued support for the subject development.

Conventional Apartments

We identified and personally surveyed 13 conventional housing projects (including the subject project) containing a total of 566 units within the Site PMA. This survey was conducted to establish the overall strength of the rental market and to identify those properties most comparable to the subject site. These rentals have a combined occupancy rate of 100.0%, a very strong rate for rental housing. The following table summarizes the project types identified in the Site PMA:

Project Type	Projects Surveyed	Total Units	Vacant Units	Occupancy Rate
Market-rate	2	66	0	100.0%
Tax Credit	3	140	0	100.0%
Tax Credit/Government-Subsidized	5	195	0	100.0%
Government-Subsidized	3	165	0	100.0%
Total	13	566	0	100.0%

As noted, all rental communities surveyed are fully occupied, nearly all of which maintain waiting lists. This illustrates that significant pent-up demand exists for all types of rental housing within the Newberry Site PMA. The subject project will continue to accommodate a portion of this unmet demand.

In addition to the eight Tax Credit properties surveyed in the market, we identified two additional Tax Credit projects which we were unable to survey at the time this report was issued. These communities include Brookside Manor, which offers 42 government-subsidized units targeting senior households located at 1871 Pond Field Road in Newberry, and Newberry Arms Apartments, which offers 60 government-units targeting family (general-occupancy) households located at 186 Newberry Arms Drive in Newberry.

The following table summarizes the breakdown of market-rate and Tax Credit units surveyed within the Site PMA.

Market-rate						
Bedroom	Baths	Units	Distribution	Vacancy	% Vacant	Median Gross Rent
Two-Bedroom	1.0	48	72.7%	0	0.0%	\$928
Two-Bedroom	1.5	14	21.2%	0	0.0%	\$910
Three-Bedroom	1.5	4	6.1%	0	0.0%	\$1,055
Total Market-rate		66	100.0%	0	0.0%	-
Tax Credit, Non-Subsidized						
Bedroom	Baths	Units	Distribution	Vacancy	% Vacant	Median Gross Rent
One-Bedroom	1.0	45	26.6%	0	0.0%	\$541
Two-Bedroom	2.0	78	46.2%	0	0.0%	\$649
Three-Bedroom	2.0	46	27.2%	0	0.0%	\$845
Total Tax Credit		169	100.0%	0	0.0%	-

As the preceding table illustrates, the median gross Tax Credit rents are well below the corresponding median gross market-rate rents. As such, Tax Credit product likely represents substantial values to low-income renters within the market. This is further evidenced by the combined 0.0% vacancy rate among all non-subsidized Tax Credit units within the Newberry Site PMA.

Government-Subsidized

We identified and surveyed eight rental communities that offer government-subsidized units within the Site PMA. Generally, these properties have few amenities, are older and offer small unit sizes (square feet). The government-subsidized units (both with and without Tax Credits) in the Site PMA are summarized as follows.

Subsidized Tax Credit					
Bedroom	Baths	Units	Distribution	Vacancy	% Vacant
One-Bedroom	1.0	48	28.9%	0	0.0%
Two-Bedroom	1.0	60	36.1%	0	0.0%
Two-Bedroom	1.5	42	25.3%	0	0.0%
Three-Bedroom	1.5	16	9.6%	0	0.0%
Total Subsidized Tax Credit		166	100.0%	0	0.0%
Government-Subsidized					
Bedroom	Baths	Units	Distribution	Vacancy	% Vacant
One-Bedroom	1.0	64	38.8%	0	0.0%
Two-Bedroom	1.0	39	23.6%	0	0.0%
Two-Bedroom	1.5	22	13.3%	0	0.0%
Three-Bedroom	1.0	16	9.7%	0	0.0%
Three-Bedroom	1.5	16	9.7%	0	0.0%
Four-Bedroom	2.0	8	4.8%	0	0.0%
Total Subsidized		165	100.0%	0	0.0%

All government-subsidized units surveyed are occupied, nearly all of which maintain a waiting list, illustrating that pent-up demand exists for very low-income rental housing within the Newberry Site PMA.

A complete list of all properties surveyed is included in Addendum A - *Field Survey of Conventional Rentals*.

4. RENTAL HOUSING INVENTORY MAP

A map identifying the location of all properties surveyed within the Newberry Site PMA is on the following page.

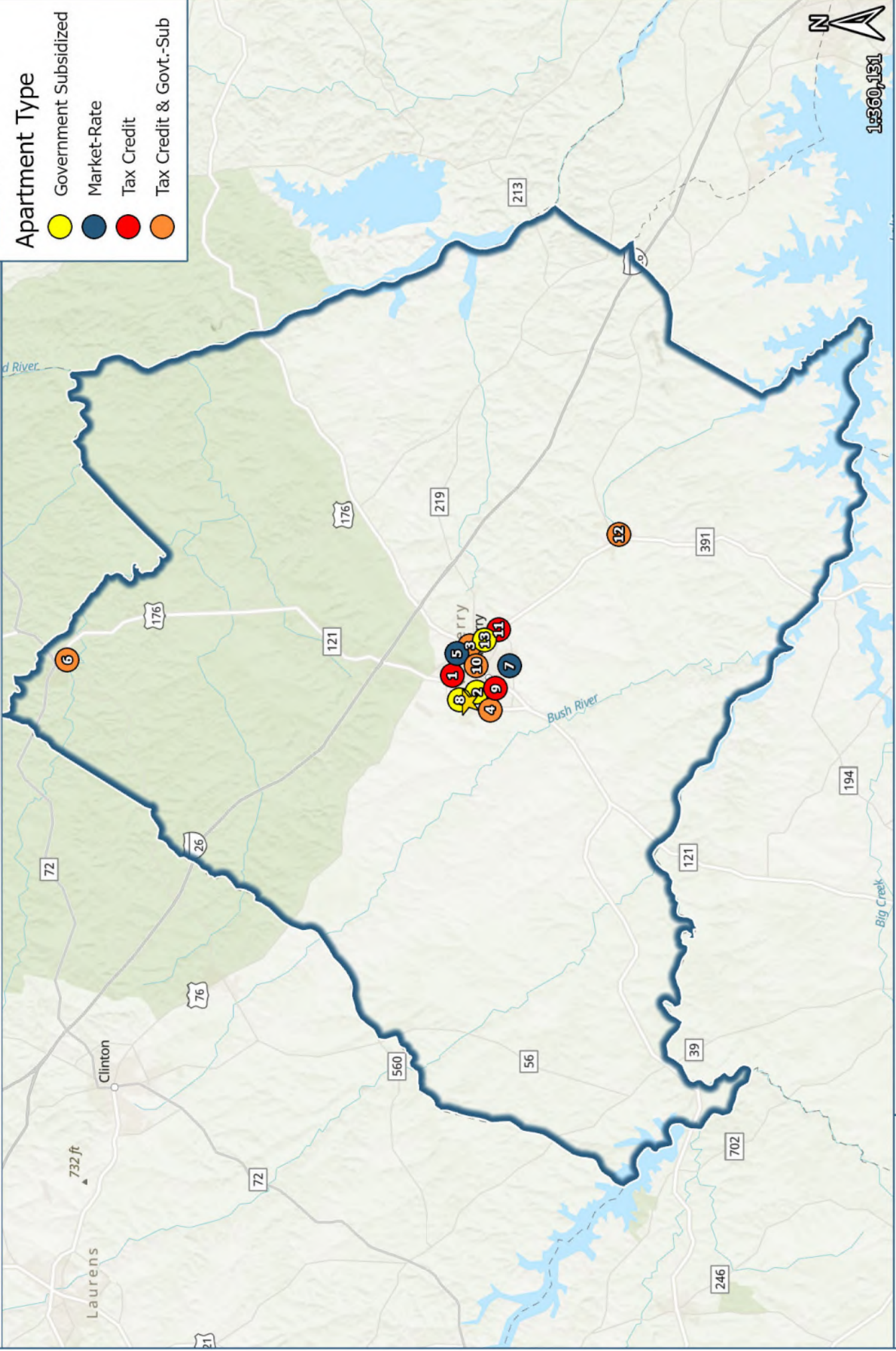


Surveyed Apartments
Newberry, SC

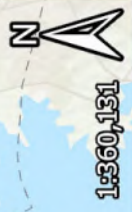
- ★ Site
- ▬ PMA

Apartment Type

- Government Subsidized
- Market-Rate
- Tax Credit
- Tax Credit & Govt.-Sub



Esri, NASA, NGA, USGS, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS
Additional Source(s): Bowen National Research



5. & 6. PLANNED AND PROPOSED DEVELOPMENTS

Based on our interviews with planning representatives, extensive online research and the observations of our analyst while in the field, it was determined that there are no rental housing projects planned or under construction within the Site PMA.

7. MARKET ADVANTAGE

Per the direction of the South Carolina (SC) Housing, the subject's market advantage must be based on current HUD Fair Market Rents (FMRs) for the statistical area the site is located.

The current HUD FMRs within Newberry County, South Carolina are \$628 for a one-, \$826 for a two- and \$1,049 for a three-bedroom unit. The following table illustrates the subject project's market advantages when compared to FMRs for the area:

Bedroom Type	Proposed Collected Rent (AMHI)	Fair Market Rent	Market Advantage
One-Bedroom	\$390 (50%)	\$628	37.90%
	\$465 (60%)		25.96%
Two-Bedroom	\$430 (50%)	\$826	47.95%
	\$550 (60%)		33.41%
Three-Bedroom	\$500 (50%)	\$1,049	52.34%
	\$625 (60%)		40.42%
Weighted Average			37.42%

As the preceding illustrates, the subject's market advantages range between 25.96% and 52.34%, when compared to the area's HUD FMRs. The weighted average market advantage is 37.42%. Regardless, we have provided an *achievable market rent* analysis for the subject units to determine the true value the proposed rents will represent to low-income renters within the area, which is illustrated later in Addendum C of this report.

8. AFFORDABLE HOUSING IMPACT

The anticipated occupancy rates of the existing comparable Tax Credit developments located within the Site PMA following stabilization of the subject property are as follows:

Map I.D.	Project	Current Occupancy Rate	Anticipated Occupancy Rate Through 2023
9	Newberry Green Apts.	100.0%	95.0%+
11	Pebblebrook Apts.	100.0%	95.0%+

Given that all comparable LIHTC rental communities within the market are fully occupied, this provides clear evidence that the existence of the subject project has not had any impact on other low-income rental housing alternatives within the Newberry Site PMA.

9. OTHER HOUSING OPTIONS (BUY VERSUS RENT)

According to ESRI, the median home value within the Site PMA was \$122,006. At an estimated interest rate of 4.5% and a 30-year term (and 95% LTV), the monthly mortgage for a \$122,006 home is \$734, including estimated taxes and insurance.

Buy Versus Rent Analysis	
Median Home Price - ESRI	\$122,006
Mortgaged Value = 95% of Median Home Price	\$115,906
Interest Rate - Bankrate.com	4.5%
Term	30
Monthly Principal & Interest	\$587
Estimated Taxes and Insurance*	\$147
Estimated Monthly Mortgage Payment	\$734

*Estimated at 25% of principal and interest

In comparison, the proposed collected Tax Credit rents for the subject property range from \$390 to \$625 per month. Therefore, the cost of a monthly mortgage for a typical home in the area is approximately \$109 to \$344 greater than the cost of renting at the subject project's Tax Credit units, depending on bedroom type and targeted income level. Therefore, it is highly unlikely that tenants that would qualify to reside at the subject project would be able to afford the monthly payments required to own a home or who would be able to afford the down payment on such a home. As such, we do not anticipate any competitive impact on or from the homebuyer market.

10. HOUSING VOIDS

As noted throughout this section of the report, all affordable rental communities surveyed in the market are fully occupied, nearly all of which maintain a waiting list, including the subject project. This provides clear evidence that pent-up demand exists for additional affordable rental housing. The subject development will continue to fill a rental housing void within the Site PMA.

I. Interviews

The following are summaries of interviews conducted with various government and private sector individuals:

- Mary Sims, Property Manager of Palmetto Pointe Apartments (subject site), confirmed the need for more affordable housing within Newberry, pointing to her property's full occupancy and 70-household waiting list. Ms. Sims stated that with her waitlist consistently growing, this is a clear sign of the lack of supply of affordable housing and, therefore, more family housing is desperately needed. *(803) 321-1951*
- Wayne Redfern, Chief Building Inspector for Newberry Planning & Development, explained that there is a definite need for more affordable housing in Newberry. Much of the housing stock in the city is not well maintained, and tenants are living in sub-par conditions. The city also has a number of low-income residents who end up living in the worse-maintained properties. Mr. Redfern added that the greatest need in the city at this time would be renovations of existing properties to bring them up to proper standards. *(803) 321-1019*
- Sara Staten, Property Manager of Nance Forest (Map ID 8), a government-subsidized community in Newberry, noted that there is in fact a need for more affordable housing in Newberry. Ms. Staten elaborated that given the rising costs of goods, and unemployment, the need for more affordable housing is only continuing to grow. *(803) 276-0131*
- Kim Yarborough, Property Manager of Pineridge Apartments (Map ID 12), a Tax Credit and Rural Development Section 515 (RD 515) property within the market in Prosperity, stated that there is a need for more affordable family housing in the area. Since there is not enough housing in the area for families and no new properties have come about, Ms. Yarborough only sees the demand for such growing. *(803) 364-0029*

J. Recommendations

Based on the findings reported in our market study, it is our opinion that a market will continue to exist following renovations at the 48-unit Palmetto Pointe Apartments, assuming it operates as proposed in this report. Note that changes in the project concept or renovation completion date may alter these findings.

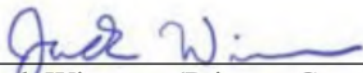
The subject site is currently 100.0% occupied and maintains a 70-household waiting list for the next available unit. As most of the subject rents will decrease or remain relatively stable post renovations, we expect all current tenants to remain at the subject project. Additionally, the subject's overall capture rate of 6.5% is considered very low and easily achievable, illustrating that a deep base of demographic support will continue to exist for the subject project. Lastly, the proposed Tax Credit rents represent market rent advantages of between 36.75% and 52.28% (as illustrated later in Addendum C of this report), illustrating that it will continue to represent a substantial value to low-income renters within the market.

We have no recommendations or suggested modifications for the subject project at this time.

K. Signed Statement Requirement

I affirm that I have made a physical inspection of the market and surrounding area and the information obtained in the field has been used to determine the need and demand for LIHTC units. I understand that any misrepresentation of this statement may result in the denial of further participation in South Carolina (SC) Housing's programs. I also affirm that I have no financial interest in the project or current business relationship with the ownership entity and my compensation is not contingent on this project being funded. This report was written according to the SC Housing's market study requirements. The information included is accurate and can be relied upon by SC Housing to present a true assessment of the low-income housing rental market.

Certified:

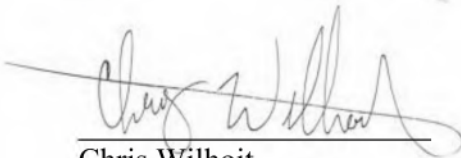


Jack Wiseman (Primary Contact)

Market Analyst

jackw@bowennational.com

Date: May 6, 2022

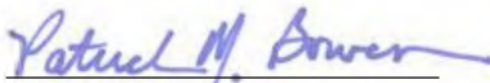


Chris Wilhoit

Market Analyst

chrisw@bowennational.com

Date: May 6, 2022



Patrick M. Bowen

President/Market Analyst

Bowen National Research

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(614) 833-9300

patrickb@bowennational.com

Date: May 6, 2022

L. Qualifications

The Company

Bowen National Research employs an expert staff to ensure that each market study is of the utmost quality. Each staff member has hands-on experience evaluating sites and comparable properties, analyzing market characteristics and trends, and providing realistic recommendations and conclusions. The Bowen National Research staff has the expertise to provide the answers for your development.

Company Leadership

Patrick Bowen is the President of Bowen National Research. He has prepared and supervised thousands of market feasibility studies for all types of real estate products, including affordable family and senior housing, multifamily market-rate housing and student housing, since 1996. He has also prepared various studies for submittal as part of HUD 221(d)(3) & (4), HUD 202 developments and applications for housing for Native Americans. He has also conducted studies and provided advice to city, county and state development entities as it relates to residential development, including affordable and market rate housing, for both rental and for-sale housing. Mr. Bowen has worked closely with many state and federal housing agencies to assist them with their market study guidelines. Mr. Bowen has his bachelor's degree in legal administration (with emphasis on business and law) from the University of West Florida.

Desireé Johnson is the Director of Operations for Bowen National Research. Ms. Johnson is responsible for all client relations, the procurement of work contracts, and the overall supervision and day-to-day operations of the company. She has been involved in the real estate market research industry since 2006. Ms. Johnson has an Associate of Applied Science in Office Administration from Columbus State Community College.

Market Analysts

Craig Rupert, Market Analyst, has conducted more than 1,000 market feasibility studies throughout the United States since 2010, within both urban and rural markets as well as on various tribal reservations. Mr. Rupert has prepared market studies for numerous types of housing including market-rate, Tax Credit, and various government-subsidized rental product, for-sale product, senior living (assisted living, nursing care, etc.), as well as market studies for retail/commercial space. Market studies prepared by Mr. Rupert have been used for submittal as part of state finance agency Tax Credit and HUD 221 (d)(4) applications, as well as various other financing applications submitted to local, regional, and national-level lenders/financial institutions. Mr. Rupert has a bachelor's degree in Hospitality Management from Youngstown State University.

Jack Wiseman, Market Analyst, has conducted extensive market research in over 200 markets throughout the United States since 2007. He provides thorough evaluation of site attributes, area competitors, market trends, economic characteristics and a wide range of issues impacting the viability of real estate development. He has evaluated market conditions for a variety of real estate alternatives, including affordable and market-rate apartments, retail and office establishments, student housing, and a variety of senior residential alternatives. Mr. Wiseman has a Bachelor of Arts degree in Economics from Miami University.

Jeff Peters, Market Analyst, has conducted on-site inspection and analysis for rental properties throughout the country since 2014. He is familiar with multiple types of rental housing programs, the day-to-day interaction with property managers and leasing agents and the collection of pertinent property details. Mr. Peters graduated from The Ohio State University with a Bachelor of Arts in Economics.

Christopher T. Bunch, Market Analyst has over ten years of professional experience in real estate, including five years of experience in the real estate market research field. Mr. Bunch is responsible for preparing market feasibility studies for a variety of clients. Mr. Bunch earned a bachelor's degree in Geography with a concentration in Urban and Regional Planning from Ohio University in Athens, Ohio.

Lisa Goff, Market Analyst, has conducted site-specific analyses in both rural and urban markets throughout the country. She is also experienced in the day-to-day operation and financing of Low-Income Housing Tax Credit and subsidized properties, which gives her a unique understanding of the impact of housing development on current market conditions.

Jonathan Kabat, Market Analyst, has surveyed both urban and rural markets throughout the country. He is trained to understand the nuances of various rental housing programs and their construction and is experienced in the collection of rental housing data from leasing agents, property managers, and other housing experts within the market. Mr. Kabat graduated from The Ohio State University with a Bachelor of Art in History and a minor in Geography.

Andrew Lundell, Market Analyst, has an experienced background in customer service and financial analysis. He has evaluated the rental market in cities throughout the United States and is able to provide detailed site-specific analysis. Mr. Lundell has a Bachelor of Arts in Criminal Justice from Ohio University.

Sidney McCrary, Market Analyst, is experienced in the on-site analysis of residential and commercial properties. He has the ability to analyze a site's location in relation to community services, competitive properties and the ease of access and visibility. Mr. McCrary has a Bachelor of Science in Business Administration from Ohio Dominican University.

Gregory Piduch, Market Analyst, has conducted site-specific analyses in both metro and rural areas throughout the country. He is familiar with multiple types of rental housing programs, the day-to-day interaction with property managers and leasing agents and the collection of pertinent property details. Mr. Piduch holds a Bachelor of Arts in Communication and Rhetoric from the University of Albany, State University of New York and a Master of Professional Studies in Sports Industry Management from Georgetown University.

Ron Pompey, Market Analyst, has surveyed both urban and rural markets throughout the country. He is trained to understand the nuances of various rental housing programs and their construction and is experienced in the collection of rental housing data from leasing agents, property managers, and other housing experts within the market. Mr. Pompey has a Bachelor of Science in Electrical Engineering from the University of Florida.

Nathan Stelts, Market Analyst, is experienced in the assessment of housing operating under various programs throughout the country, as well as other development alternatives. He is also experienced in evaluating projects in the development pipeline and economic trends. Mr. Stelts has a Bachelor of Science in Business Administration from Bowling Green State University.

Chris Wilhoit, Market Analyst, has conducted site-specific analyses in both metro and rural areas throughout the country. He is familiar with multiple types of rental housing programs, the day-to-day interaction with property managers and leasing agents and the collection of pertinent property details. Mr. Wilhoit also has a background in architectural photography.

Research Staff

Bowen National Research employs a staff of in-house researchers who are experienced in the surveying and evaluation of all rental and for-sale housing types, as well as in conducting interviews and surveys with city officials, economic development offices, chambers of commerce, housing authorities and residents.

June Davis, Office Manager of Bowen National Research, has been in the market feasibility research industry since 1988. Ms. Davis has overseen production on over 20,000 market studies for projects throughout the United States.

Stephanie Viren is the Research and Travel Coordinator at Bowen National Research. Ms. Viren focuses on collecting detailed data concerning housing conditions in various markets throughout the United States. Ms. Viren has extensive interviewing skills and experience and also possesses the expertise necessary to conduct surveys of diverse pools of respondents regarding population and housing trends, housing marketability, economic development and other socioeconomic issues relative to the housing industry. Ms. Viren's professional specialty is condominium and senior housing research. Ms. Viren earned a Bachelor of Arts in Business Administration from Heidelberg University.

Kelly Wiseman, Research Specialist Director, has significant experience in the evaluation and surveying of housing projects operating under a variety of programs. In addition, she has conducted numerous interviews with experts throughout the country, including economic development, planning, housing authorities and other stakeholders.

M. Methodologies, Disclaimers & Sources

This market feasibility analysis complies with the requirements established by South Carolina (SC) Housing and conforms to the standards adopted by the National Council of Housing Market Analysts (NCHMA). These standards include the acceptable definitions of key terms used in market studies for affordable housing projects and model standards for the content of market studies for affordable housing projects. The standards are designed to enhance the quality of market studies and to make them easier to prepare, understand and use by market analysts and end users.

1. METHODOLOGIES

Methodologies used by Bowen National Research include the following:

- The Primary Market Area (PMA) generated for the proposed site is identified. The PMA is generally described as the smallest geographic area expected to generate most of the support for the proposed project. PMAs are not defined by a radius. The use of a radius is an ineffective approach because it does not consider mobility patterns, changes in the socioeconomic or demographic character of neighborhoods or physical landmarks that might impede development.

PMAs are established using a variety of factors, including, but not limited to:

- A detailed demographic and socioeconomic evaluation
 - Interviews with area planners, realtors and other individuals who are familiar with area growth patterns
 - A drive-time analysis for the site
 - Personal observations of the field analyst
- A field survey of modern apartment developments is conducted. The intent of the field survey is twofold. First, the field survey is used to measure the overall strength of the apartment market. This is accomplished by an evaluation of unit mix, vacancies, rent levels and overall quality of product. The second purpose of the field survey is to establish those projects that are most likely directly comparable to the subject property. The information in this survey was collected through a variety of methods, including phone surveys, in-person visits, email and fax. The contact person for each property is listed in *Addendum A: Field Survey of Conventional Rentals*.
 - Two types of directly comparable properties are identified through the field survey. They include other Section 42 LIHTC developments and market-rate developments that offer unit and project amenities similar to those of the proposed development. An in-depth evaluation of these two property types provides an indication of the potential of the proposed development.

- Economic and demographic characteristics of the area are evaluated. An economic evaluation includes an assessment of area employment composition, income growth (particularly among the target market), building statistics and area growth perceptions. The demographic evaluation uses the most recently issued Census information and projections that determine what the characteristics of the market will be when the proposed project opens and achieves a stabilized occupancy.
- Area building statistics and interviews with officials familiar with area development provide identification of the properties that might be planned or proposed for the area that will have an impact on the marketability of the proposed development. Planned and proposed projects are always in different stages of development. As a result, it is important to establish the likelihood of construction, the timing of the project and its impact on the market and the proposed development.
- An analysis of the proposed project's market capture of income-appropriate renter households within the PMA is conducted. This analysis follows SC's Housing's methodology for calculating potential demand. The resulting capture rates are compared with acceptable market capture rates for similar types of projects to determine whether the proposed development's capture rate is achievable.
- Achievable market rent for the proposed subject development is determined. Using a Rent Comparability Grid, the features of the proposed development are compared item by item to the most comparable properties in the market. Adjustments are made for each feature that differs from that of the proposed subject development. These adjustments are then included with the collected rent resulting in an achievable market rent for a unit comparable to the proposed unit. This analysis is done for each bedroom type proposed for the site.

Please note that non-numbered items in this report are not required by SC Housing; they have been included, however, based on Bowen National Research's opinion that it is necessary to consider these details to effectively address the development potential of proposed projects.

2. REPORT LIMITATIONS

The intent of this report is to collect and analyze significant levels of data to forecast the market success of the subject property within an agreed to time period. Bowen National Research relies on a variety of sources of data to generate this report. These data sources are not always verifiable; Bowen National Research, however, makes a significant effort to ensure accuracy. While this is not always possible, we believe our effort provides an acceptable standard margin of error. Bowen National Research is not responsible for errors or omissions in the data provided by other sources.

The reported analyses, opinions and conclusions are limited only by the reported assumptions and limiting conditions and are our personal, unbiased professional analyses, opinions and conclusions. We have no present or prospective interest in the property that is the subject of this report, and we have no personal interest or bias with respect to the parties involved. Our compensation is not contingent on an action or event (such as the approval of a loan) resulting from the analyses, opinions, conclusions in or the use of this study.

Any reproduction or duplication of this report without the express approval of Bowen National Research is strictly prohibited.

3. SOURCES

Bowen National Research uses various sources to gather and confirm data used in each analysis. These sources, which are cited throughout this report, include the following:

- The 2000 and 2010 Census on Housing
- American Community Survey
- ESRI
- Urban Decision Group (UDG)
- Applied Geographic Solutions
- Area Chamber of Commerce
- U.S. Department of Labor
- U.S. Department of Commerce
- Management for each property included in the survey
- Local planning and building officials
- Local housing authority representatives
- SC Housing

ADDENDUM A:

FIELD SURVEY OF
CONVENTIONAL RENTALS



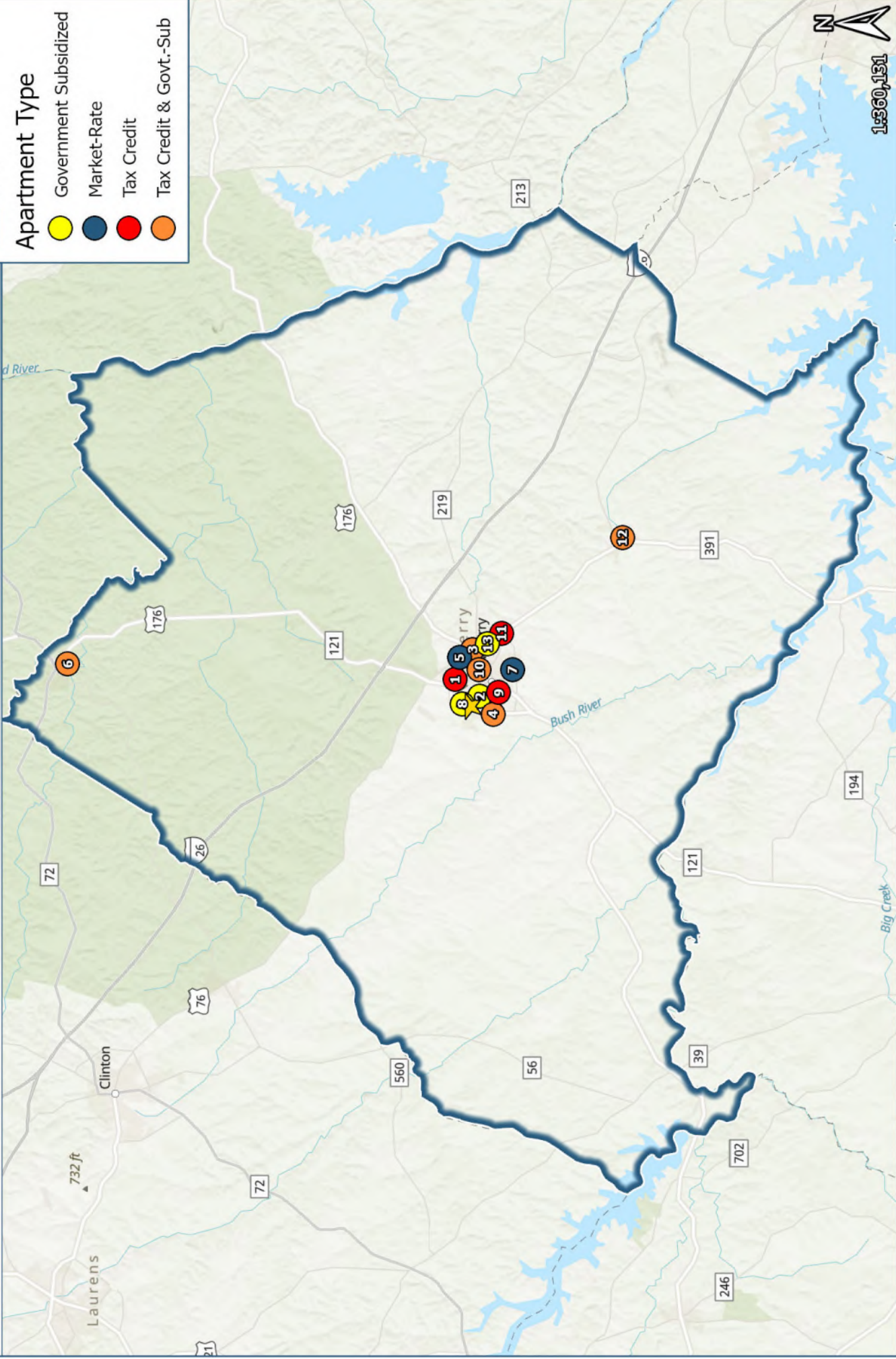
Surveyed Apartments Newberry, SC

BOWEN
NATIONAL
RESEARCH

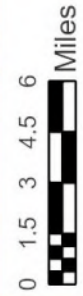
- ★ Site
- ▬ PMA

Apartment Type

- Government Subsidized
- Market-Rate
- Tax Credit
- Tax Credit & Govt.-Sub




Esri, NASA, NGA, USGS, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS
 Additional Source(s): Bowen National Research

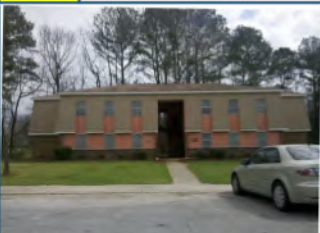



Map ID	Property	Prop Type	Quality Rating	Year Built	Total Units	Vacant	Occ. Rate	Distance To Site*
1	Palmetto Pointe	TAX	B-	2006	48	0	100.0%	-
2	Bethlehem Homes	GSS	C-	1968	55	0	100.0%	0.9
3	Heritage Square Townhomes	TGS	C	1978	52	0	100.0%	3.3
4	Indian Hills	TGS	B-	1980	60	0	100.0%	1.4
✓ 5	Indian Land Apts.	MRR	C	1977	52	0	100.0%	2.4
6	Jerine Apts.	TGS	C	1985	24	0	100.0%	16.9
✓ 7	Magnolia Manor	MRR	A	2006	14	0	100.0%	2.6
8	Nance Forest	GSS	B-	1979	74	0	100.0%	0.4
✓ 9	Newberry Green Apts.	TAX	B	2007	44	0	100.0%	2.4
◆ 10	Newberry Senior Housing	TGS	B	1908	35	0	100.0%	2.4
✓ 11	Pebblebrook Apts.	TAX	B+	2013	48	0	100.0%	4.6
12	Pineridge Apts.	TGS	B-	1985	24	0	100.0%	10.3
13	Tremont Apts.	GSS	B	1986	36	0	100.0%	3.1
✓ 902	Cardinal Glen	MRR	B	2003	64	0	100.0%	35.3
✓ 903	Clinton Green	TAX	B	2010	40	0	100.0%	22.1
✓ 905	Deer Wood Apts.	TAX	B-	1997	72	0	100.0%	38.1
✓ 910	Regency Park	MRR	B+	2001	132	0	100.0%	38.4
✓ 912	Winter Ridge	MRR	B	2007	252	0	100.0%	37.4


*Drive distance in miles

✓ Comparable Property	(MIG) Market-Rate, Income-Restricted (not LIHTC) & Govt-Subsidized	(TIG) Tax Credit, Income-Restricted (not LIHTC) & Govt-Subsidized
◆ Senior Restricted	(TAX) Tax Credit	(INR) Income-Restricted (not LIHTC)
(MRR) Market-Rate	(TGS) Tax Credit & Government-Subsidized	(ING) Income-Restricted (not LIHTC) & Government-Subsidized
(MRT) Market-Rate & Tax Credit	(TMI) Tax Credit, Market-Rate, Income-Restricted (not LIHTC)	(GSS) Government-Subsidized
(MRG) Market-Rate & Government-Subsidized	(TIN) Tax Credit & Income-Restricted (not LIHTC)	(ALL) Tax Credit, Market-Rate, Govt-Subsidized & Income-Restricted
(MIN) Market-Rate & Income-Restricted (not LIHTC)	(TMG) Tax Credit, Market-Rate & Government-Subsidized	


1	Palmetto Pointe		Contact: Mary Sims		
	1123 Palmetto Pointe Dr., Newberry, SC 29108		Phone: (803) 321-1951		
		Total Units: 48 UC: 0	Occupancy: 100.0%	Stories: 2	Year Built: 2006
		BR: 1, 2, 3	Vacant Units: 0	Waitlist: 70 HH	AR Year:
		Target Population: Family			Yr Renovated:
		Rent Special: None			
		Notes: Tax Credit			

2	Bethlehem Homes		Contact: Laurie Meadow		
	900 Suber Dr., Newberry, SC 29108		Phone: (803) 768-8375		
		Total Units: 55 UC: 5	Occupancy: 100.0%	Stories: 2	Year Built: 1968
		BR: 1, 2, 3, 4	Vacant Units: 0	Waitlist: 393 HH	AR Year:
		Target Population: Family			Yr Renovated: 1980
		Rent Special: None			
		Notes: Public Housing; 5 units under renovation			


3	Heritage Square Townhomes		Contact: Kim		
	2604 Myrtle St, Newberry, SC 29108		Phone: (803) 276-8697		
		Total Units: 52 UC: 0	Occupancy: 100.0%	Stories: 1,2	Year Built: 1978
		BR: 1, 2, 3	Vacant Units: 0	Waitlist: None	AR Year:
		Target Population: Family			Yr Renovated: 2008
		Rent Special: None			
		Notes: Tax Credit; RD 515, has RA (30 units)			


4	Indian Hills		Contact: Leanne		
	1935 Drayton St., Newberry, SC 29108		Phone: (803) 276-6375		
		Total Units: 60 UC: 0	Occupancy: 100.0%	Stories: 2	Year Built: 1980
		BR: 1, 2	Vacant Units: 0	Waitlist: 65 HH	AR Year:
		Target Population: Family			Yr Renovated: 2019
		Rent Special: None			
		Notes: Tax Credit; RD 515, has RA (59 units)			





5	Indian Land Apts.		Contact: Kayla		
	1728 Indian Land Dr., Newberry, SC 29108		Phone: (864) 534-3479		
		Total Units: 52 UC: 0	Occupancy: 100.0%	Stories: 2	Year Built: 1977
		BR: 2, 3	Vacant Units: 0	Waitlist: 36-48 mos	AR Year:
		Target Population: Family			Yr Renovated:
		Rent Special: None			
		Notes:			


Comparable Property	(MIG) Market-Rate, Income-Restricted (not LIHTC) & Govt-Subsidized	(TIG) Tax Credit, Income-Restricted (not LIHTC) & Govt-Subsidized
Senior Restricted	(TAX) Tax Credit	(INR) Income-Restricted (not LIHTC)
(MRR) Market-Rate	(TGS) Tax Credit & Government-Subsidized	(ING) Income-Restricted (not LIHTC) & Government-Subsidized
(MRT) Market-Rate & Tax Credit	(TMI) Tax Credit, Market-Rate, Income-Restricted (not LIHTC)	(GSS) Government-Subsidized
(MRG) Market-Rate & Government-Subsidized	(TIN) Tax Credit & Income-Restricted (not LIHTC)	(ALL) Tax Credit, Market-Rate, Govt-Subsidized & Income-Restricted
(MIN) Market-Rate & Income-Restricted (not LIHTC)	(TMG) Tax Credit, Market-Rate & Government-Subsidized	


















6	Jerine Apts. 311 Subertown Rd., Whitmire, SC 29178	Contact: Cindy Phone: (803) 694-3638
		<p>Total Units: 24 UC: 0 Occupancy: 100.0% Stories: 2 Year Built: 1985</p> <p>BR: 1, 2 Vacant Units: 0 Waitlist: 8 HH AR Year:</p> <p>Target Population: Family Yr Renovated: 2010</p> <p>Rent Special: None</p> <p>Notes: Tax Credit; RD 515, has RA (22 units)</p>

7	Magnolia Manor 117 Caldwell St., Newberry, SC 29108	Contact: Gail Phone: (803) 276-9223
		<p>Total Units: 14 UC: 0 Occupancy: 100.0% Stories: 2 Year Built: 2006</p> <p>BR: 2 Vacant Units: 0 Waitlist: 4 HH AR Year:</p> <p>Target Population: Family Yr Renovated:</p> <p>Rent Special: None</p> <p>Notes:</p>


8	Nance Forest 175 Nance Forest Dr., Newberry, SC 29108	Contact: Sheila Phone: (803) 276-0131
		<p>Total Units: 74 UC: 0 Occupancy: 100.0% Stories: 1,2 Year Built: 1979</p> <p>BR: 1, 2, 3 Vacant Units: 0 Waitlist: 100 HH AR Year:</p> <p>Target Population: Family Yr Renovated:</p> <p>Rent Special: None</p> <p>Notes: HUD Section 8</p>


9	Newberry Green Apts. 411 Monroe St., Newberry, SC 29108	Contact: Ranzella Wright Phone: (803) 276-0064
		<p>Total Units: 44 UC: 0 Occupancy: 100.0% Stories: 2 Year Built: 2007</p> <p>BR: 1, 2, 3 Vacant Units: 0 Waitlist: 15 HH AR Year:</p> <p>Target Population: Family Yr Renovated:</p> <p>Rent Special: None</p> <p>Notes: Tax Credit</p>


10	Newberry Senior Housing 1306 Hunt St., Newberry, SC 29108	Contact: Margaret Phone: (803) 321-9277
		<p>Total Units: 35 UC: 0 Occupancy: 100.0% Stories: 2 w/Elevator Year Built: 1908</p> <p>BR: 1 Vacant Units: 0 Waitlist: 10 HH AR Year: 2004</p> <p>Target Population: Senior 55+, Disabled Yr Renovated:</p> <p>Rent Special: None</p> <p>Notes: Tax Credit (29 units); HUD Section 8 & Tax credit (6 units)</p>

<ul style="list-style-type: none">  Comparable Property  Senior Restricted  (MRR) Market-Rate  (MRT) Market-Rate & Tax Credit  (MRG) Market-Rate & Government-Subsidized  (MIN) Market-Rate & Income-Restricted (not LIHTC) 	<ul style="list-style-type: none">  (MIG) Market-Rate, Income-Restricted (not LIHTC) & Govt-Subsidized  (TAX) Tax Credit  (TGS) Tax Credit & Government-Subsidized  (TMI) Tax Credit, Market-Rate, Income-Restricted (not LIHTC)  (TIN) Tax Credit & Income-Restricted (not LIHTC)  (TMG) Tax Credit, Market-Rate & Government-Subsidized 	<ul style="list-style-type: none">  (TIG) Tax Credit, Income-Restricted (not LIHTC) & Govt-Subsidized  (INR) Income-Restricted (not LIHTC)  (ING) Income-Restricted (not LIHTC) & Government-Subsidized  (GSS) Government-Subsidized  (ALL) Tax Credit, Market-Rate, Govt-Subsidized & Income-Restricted
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11	Pebblebrook Apts. 5000 Pebblebrook Dr., Newberry, SC 29108	Contact: Kymberly Phone: (803) 251-9075
	 <p>Total Units: 48 UC: 0 Occupancy: 100.0% Stories: 3 Year Built: 2013 BR: 2, 3 Vacant Units: 0 Waitlist: 6 mos AR Year: Target Population: Family Yr Renovated: Rent Special: None Notes: Tax Credit</p>	


12	Pineridge Apts. 125 Pine St, Prosperity, SC 29127	Contact: Kim Phone: (803) 364-0029
	 <p>Total Units: 24 UC: 0 Occupancy: 100.0% Stories: 2 Year Built: 1985 BR: 1, 2 Vacant Units: 0 Waitlist: 6 HH AR Year: Target Population: Family Yr Renovated: 1997 Rent Special: None Notes: Tax Credit; RD 515, has RA (19 units)</p>	

13	Tremont Apts. 1139 Copeland St., Newberry, SC 29108	Contact: Dorena Phone: (803) 276-2057
	 <p>Total Units: 36 UC: 0 Occupancy: 100.0% Stories: 1,2 Year Built: 1986 BR: 1, 2 Vacant Units: 0 Waitlist: Yes AR Year: Target Population: Family Yr Renovated: Rent Special: None Notes: RD 515, has RA (36 units)</p>	




902	Cardinal Glen 1524 Parkway Rd., Greenwood, SC 29646	Contact: Tom Phone: (864) 943-8883
	 <p>Total Units: 64 UC: 0 Occupancy: 100.0% Stories: 2 Year Built: 2003 BR: 1, 2, 3 Vacant Units: 0 Waitlist: 5 HH AR Year: Target Population: Family Yr Renovated: Rent Special: None Notes:</p>	




903	Clinton Green 100 Houser Cir., Clinton, SC 29325	Contact: Sylvia Phone: (864) 547-1662
	 <p>Total Units: 40 UC: 0 Occupancy: 100.0% Stories: 2 Year Built: 2010 BR: 2, 3 Vacant Units: 0 Waitlist: 8 HH AR Year: Target Population: Family Yr Renovated: Rent Special: None Notes: Tax Credit</p>	

Comparable Property	(MIG) Market-Rate, Income-Restricted (not LIHTC) & Govt-Subsidized	(TIG) Tax Credit, Income-Restricted (not LIHTC) & Govt-Subsidized
Senior Restricted	(TAX) Tax Credit	(INR) Income-Restricted (not LIHTC)
(MRR) Market-Rate	(TGS) Tax Credit & Government-Subsidized	(ING) Income-Restricted (not LIHTC) & Government-Subsidized
(MRT) Market-Rate & Tax Credit	(TMI) Tax Credit, Market-Rate, Income-Restricted (not LIHTC)	(GSS) Government-Subsidized
(MRG) Market-Rate & Government-Subsidized	(TIN) Tax Credit & Income-Restricted (not LIHTC)	(ALL) Tax Credit, Market-Rate, Govt-Subsidized & Income-Restricted
(MIN) Market-Rate & Income-Restricted (not LIHTC)	(TMG) Tax Credit, Market-Rate & Government-Subsidized	




905	Deer Wood Apts.	Contact: Shannon
647 U.S. Hwy. 321 Bypass So., Winnsboro, SC 29180		Phone: (803) 712-9098
	Total Units: 72 UC: 0 Occupancy: 100.0% Stories: 2 Year Built: 1997	
	BR: 1, 2, 3 Vacant Units: 0 Waitlist: 11 HH AR Year:	
	Target Population: Family Yr Renovated: 2016	
	Rent Special: None	
	Notes: Tax Credit	



910	Regency Park	Contact: Doug
120 Edinborough Cir., Greenwood, SC 29646		Phone: (864) 943-1333
	Total Units: 132 UC: 0 Occupancy: 100.0% Stories: 3 Year Built: 2001	
	BR: 1, 2, 3 Vacant Units: 0 Waitlist: None AR Year:	
	Target Population: Family Yr Renovated:	
	Rent Special: None	
	Notes:	



912	Winter Ridge	Contact: Brooke
102 Winter Way, Greenwood, SC 29649		Phone: (864) 943-9191
	Total Units: 252 UC: 0 Occupancy: 100.0% Stories: 2 Year Built: 2007	
	BR: 1, 2, 3 Vacant Units: 0 Waitlist: 21 HH AR Year:	
	Target Population: Family Yr Renovated:	
	Rent Special: None	
	Notes:	

Comparable Property	(MIG) Market-Rate, Income-Restricted (not LIHTC) & Govt-Subsidized	(TIG) Tax Credit, Income-Restricted (not LIHTC) & Govt-Subsidized
Senior Restricted	(TAX) Tax Credit	(INR) Income-Restricted (not LIHTC)
(MRR) Market-Rate	(TGS) Tax Credit & Government-Subsidized	(ING) Income-Restricted (not LIHTC) & Government-Subsidized
(MRT) Market-Rate & Tax Credit	(TMI) Tax Credit, Market-Rate, Income-Restricted (not LIHTC)	(GSS) Government-Subsidized
(MRG) Market-Rate & Government-Subsidized	(TIN) Tax Credit & Income-Restricted (not LIHTC)	(ALL) Tax Credit, Market-Rate, Govt-Subsidized & Income-Restricted
(MIN) Market-Rate & Income-Restricted (not LIHTC)	(TMG) Tax Credit, Market-Rate & Government-Subsidized	

Source: Newberry Housing Authority
Effective: 01/2022

Monthly Dollar Allowances

		Garden						Townhome					
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Heating	Natural Gas	26	26	31	37	0	0	26	26	31	37	0	0
	+Base Charge	0	0	0	0	0	0	0	0	0	0	0	0
	Bottled Gas	71	71	90	110	0	0	71	71	90	110	0	0
	Electric	22	22	28	34	0	0	22	22	28	34	0	0
	Heat Pump	0	0	0	0	0	0	0	0	0	0	0	0
	Oil	41	41	53	64	0	0	41	41	53	64	0	0
Cooking	Natural Gas	9	9	10	11	0	0	9	9	10	11	0	0
	Bottled Gas	25	25	29	32	0	0	25	25	29	32	0	0
	Electric	6	6	7	8	0	0	6	6	7	8	0	0
Other Electric	48	48	55	65	0	0	48	48	55	65	0	0	
+Base Charge	0	0	0	0	0	0	0	0	0	0	0	0	
Air Conditioning	13	13	18	23	0	0	13	13	18	23	0	0	
Water Heating	Natural Gas	15	15	18	21	0	0	15	15	18	21	0	0
	Bottled Gas	40	40	50	60	0	0	40	40	50	60	0	0
	Electric	20	20	25	30	0	0	20	20	25	30	0	0
	Oil	0	0	0	0	0	0	0	0	0	0	0	0
Water	25	25	28	31	0	0	25	25	28	31	0	0	
Sewer	47	47	49	54	0	0	47	47	49	54	0	0	
Trash Collection	18	18	18	18	0	0	18	18	18	18	0	0	
Internet*	20	20	20	20	20	20	20	20	20	20	20	20	
Cable*	20	20	20	20	20	20	20	20	20	20	20	20	
Alarm Monitoring*	0	0	0	0	0	0	0	0	0	0	0	0	

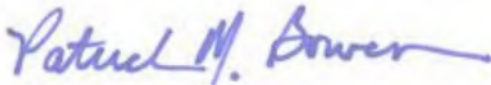
* Estimated- not from source

Addendum B – Member Certification & Checklist

This market study has been prepared by Bowen National Research, a member in good standing of the National Council of Housing Market Analysts (NCHMA). This study has been prepared in conformance with the standards adopted by NCHMA for the market analysts' industry. These standards include the *Standard Definitions of Key Terms Used in Market Studies for Housing Projects*, and *Model Content Standards for the Content of Market Studies for Housing Projects*. These Standards are designed to enhance the quality of market studies and to make them easier to prepare, understand, and use by market analysts and by the end users. These Standards are voluntary only, and no legal responsibility regarding their use is assumed by the National Council of Housing Market Analysts.

Bowen National Research is duly qualified and experienced in providing market analysis for Housing. The company's principals participate in the National Council of Housing Market Analysts (NCHMA) educational and information sharing programs to maintain the highest professional standards and state-of-the-art knowledge. Bowen National Research is an independent market analyst. No principal or employee of Bowen National Research has any financial interest whatsoever in the development for which this analysis has been undertaken.

Certified:

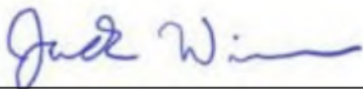


Patrick M. Bowen

President

patrickb@bowennational.com

Date: May 6, 2022



Jack Wiseman

Market Analyst

jackw@bowennational.com

Date: May 6, 2022

Note: Information on the National Council of Housing Market Analysts may be obtained by calling 202-939-1750, or by visiting <http://www.housingonline.com>.

ADDENDUM-MARKET STUDY INDEX

A. INTRODUCTION

Members of the National Council of Housing Market Analysts provide a checklist referencing all components of their market study. This checklist is intended to assist readers on the location content of issues relevant to the evaluation and analysis of market studies.

B. DESCRIPTION AND PROCEDURE FOR COMPLETING

The following components have been addressed in this market study. The section number of each component is noted below. Each component is fully discussed in that section. In cases where the item is not relevant, the author has indicated 'N/A' or not applicable. Where a conflict with or variation from client standards or client requirements exists, the author has indicated a 'VAR' (variation) with a comment explaining the conflict.

C. CHECKLIST

		Section (s)
Executive Summary		
1.	Executive Summary (Exhibit S-2)	A
Project Description		
2.	Proposed number of bedrooms and baths proposed, income limitations, proposed rents and utility allowances	B
3.	Utilities (and utility sources) included in rent	B
4.	Project design description	B
5.	Unit and project amenities; parking	B
6.	Public programs included	B
7.	Target population description	B
8.	Date of construction/preliminary completion	B
9.	If rehabilitation, existing unit breakdown and rents	B
10.	Reference to review/status of project plans	B
Location and Market Area		
11.	Market area/secondary market area description	D
12.	Concise description of the site and adjacent parcels	C
13.	Description of site characteristics	C
14.	Site photos/maps	C
15.	Map of community services	C
16.	Visibility and accessibility evaluation	C
17.	Crime Information	C

CHECKLIST (Continued)

		Section (s)
EMPLOYMENT AND ECONOMY		
18.	Employment by industry	E
19.	Historical unemployment rate	E
20.	Area major employers	E
21.	Five-year employment growth	E
22.	Typical wages by occupation	E
23.	Discussion of commuting patterns of area workers	E
DEMOGRAPHIC CHARACTERISTICS		
24.	Population and household estimates and projections	F
25.	Area building permits	H
26.	Distribution of income	F
27.	Households by tenure	F
COMPETITIVE ENVIRONMENT		
28.	Comparable property profiles	H
29.	Map of comparable properties	H
30.	Comparable property photographs	H
31.	Existing rental housing evaluation	H
32.	Comparable property discussion	H
33.	Area vacancy rates, including rates for Tax Credit and government-subsidized	H
34.	Comparison of subject property to comparable properties	H
35.	Availability of Housing Choice Vouchers	H
36.	Identification of waiting lists	H & Addendum A
37.	Description of overall rental market including share of market-rate and affordable properties	H
38.	List of existing LIHTC properties	H
39.	Discussion of future changes in housing stock	H
40.	Discussion of availability and cost of other affordable housing options including homeownership	H
41.	Tax Credit and other planned or under construction rental communities in market area	H
ANALYSIS/CONCLUSIONS		
42.	Calculation and analysis of Capture Rate	G
43.	Calculation and analysis of Penetration Rate	N/A
44.	Evaluation of proposed rent levels	H
45.	Derivation of Achievable Market Rent and Market Advantage	H & Addendum C
46.	Derivation of Achievable Restricted Rent	N/A
47.	Precise statement of key conclusions	J
48.	Market strengths and weaknesses impacting project	J
49.	Recommendations and/or modification to project discussion	J
50.	Discussion of subject property's impact on existing housing	H
51.	Absorption projection with issues impacting performance	G & J
52.	Discussion of risks or other mitigating circumstances impacting project projection	J
53.	Interviews with area housing stakeholders	I

CHECKLIST (Continued)

OTHER REQUIREMENTS		Section (s)
54.	Preparation date of report	Title Page
55.	Date of Field Work	C
56.	Certifications	K
57.	Statement of qualifications	L
58.	Sources of data not otherwise identified	D
59.	Utility allowance schedule	Addendum A

Addendum C – Achievable Market Rent Analysis

A. INTRODUCTION

We identified five market-rate properties within or near the Newberry Site PMA that we consider comparable to the subject development. These selected properties are used to derive market rent for a project with characteristics similar to the subject development and the subject property's market advantage. It is important to note that, for the purpose of this analysis, we only select market-rate properties. Market-rate properties are used to determine rents that can be achieved in the open market for the subject units without maximum income and rent restrictions.

The basis for the selection of these projects includes, but is not limited to, the following factors:

- Surrounding neighborhood characteristics
- Target market (seniors, families, disabled, etc.)
- Unit types offered (garden or townhouse, bedroom types, etc.)
- Building type (single-story, midrise, high-rise, etc.)
- Unit and project amenities offered
- Age and appearance of property

Since it is unlikely that any two properties are identical, we adjust the collected rent (the actual rent paid by tenants) of the selected properties according to whether or not they compare favorably with the subject development. Rents of projects that have additional or better features than the subject site are adjusted negatively, while projects with inferior or fewer features are adjusted positively. For example, if the subject project does not have a washer or dryer and a selected property does, then we lower the collected rent of the selected property by the estimated value of a washer and dryer to derive an *achievable market rent* for a project similar to the project.

The rent adjustments used in this analysis are based on various sources, including known charges for additional features within the Site PMA, estimates made by area property managers and realtors, quoted rental rates from furniture rental companies and Bowen National Research's prior experience in markets nationwide.

It is important to note that one or more of the selected properties may be more similar to the subject property than others. These properties are given more weight in terms of reaching the final achievable market rent determination. While monetary adjustments are made for various unit and project features, the final market rent determination is based upon the judgments of our market analysts.

The subject development and the five selected properties include the following:

Map I.D.	Project Name	Year Built/ Renovated	Total Units	Occ. Rate	Unit Mix (Occupancy Rate)		
					One-Br.	Two-Br.	Three-Br.
Site	Palmetto Pointe Apartments	2006 / 2023	48	100.0%	12 (100.0%)	24 (100.0%)	12 (100.0%)
5	Indian Land Apts.	1977	52	100.0%	-	48 (100.0%)	4 (100.0%)
7	Magnolia Manor	2006	14	100.0%	-	14 (100.0%)	-
902	Cardinal Glen	2003	64	100.0%	16 (100.0%)	32 (100.0%)	16 (100.0%)
910	Regency Park	2001	132	100.0%	18 (100.0%)	66 (100.0%)	48 (100.0%)
912	Winter Ridge	2007	252	100.0%	64 (100.0%)	132 (100.0%)	56 (100.0%)

Occ. – Occupancy

900 series Map IDs are located outside the Site PMA

The five selected market-rate projects have a combined total of 514 units with an overall occupancy rate of 100.0%, a very strong rate for rental housing. This illustrates that these projects have been very well received within the market and nearby region and will serve as accurate benchmarks with which to compare the subject development.

The Rent Comparability Grids on the following pages show the collected rents for each of the selected properties and illustrate the adjustments made (as needed) for various features and location or neighborhood characteristics, as well as quality differences that exist among the selected properties and the subject development. Preceding the Rent Comparability Grids is a map of the comparable market-rate properties in relation to the location of the subject project.



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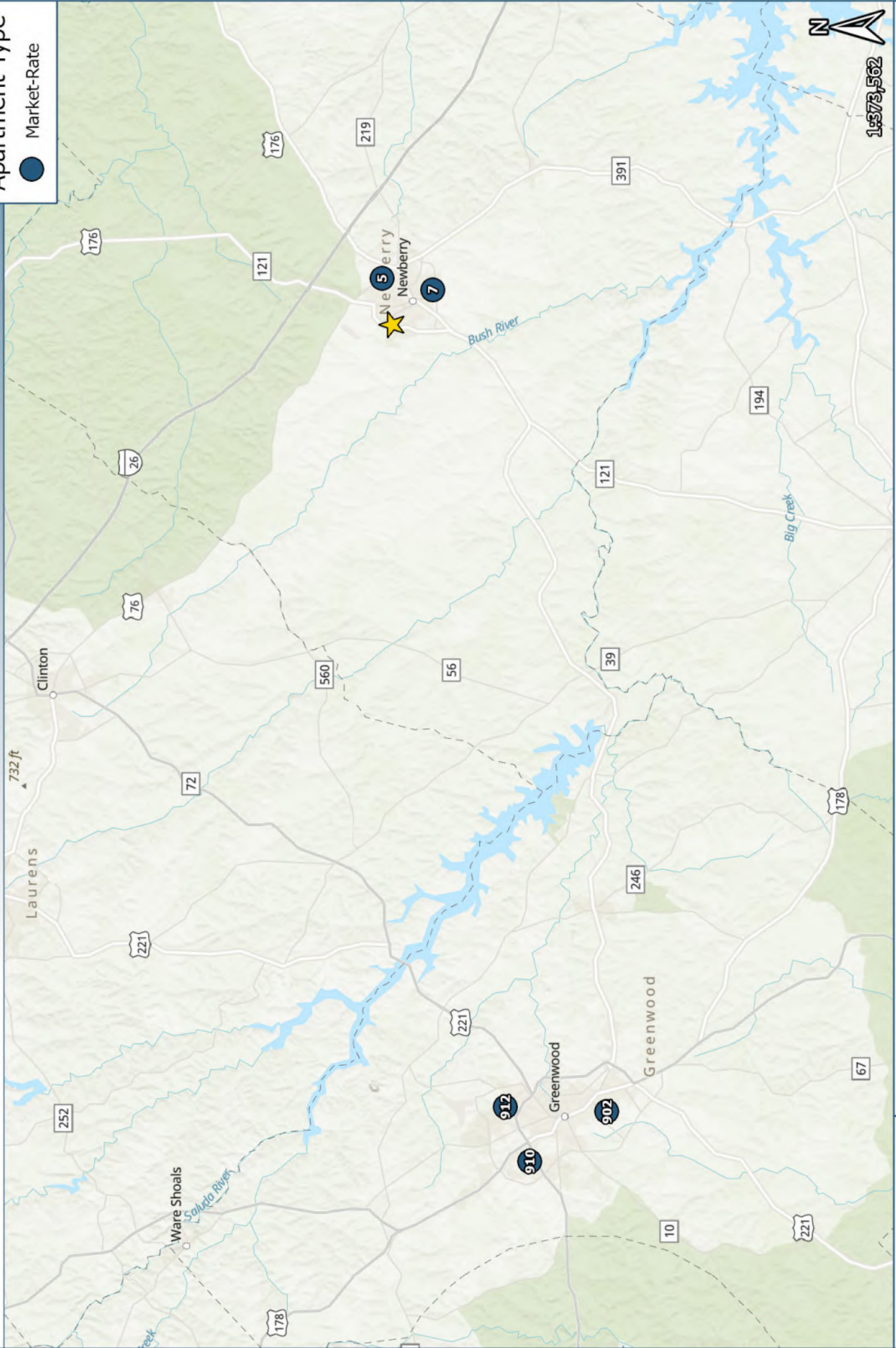
Comparable Market-Rate Property Locations

Newberry, SC

★ Site

Apartment Type

● Market-Rate



Esri, NASA, NGA, USGS, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS
Additional Source(s): Bowen National Research

0 1.5 3 4.5 6 Miles

1,373,562

Rent Comparability Grid

Unit Type →

ONE-BEDROOM

Subject		Comp #1		Comp #2		Comp #3		Comp #4		Comp #5	
Palmetto Pointe Apartments		Indian Land Apts.		Magnolia Manor		Cardinal Glen		Regency Park		Winter Ridge	
1123 Palmetto Pointe Drive		1728 Indian Land Dr.		117 Caldwell St.		1524 Parkway Rd.		120 Edinborough Cir.		102 Winter Way	
Newberry, SC		Newberry, SC		Newberry, SC		Greenwood, SC		Greenwood, SC		Greenwood, SC	
Data		Data		Data		Data		Data		Data	
on		\$ Adj		\$ Adj		\$ Adj		\$ Adj		\$ Adj	
Subject		Data		Data		Data		Data		Data	
A.	Rents Charged	\$795		\$700		\$810		\$915		\$775	
1	\$ Last Rent / Restricted?										
2	Date Surveyed	Apr-22		Apr-22		Apr-22		Apr-22		Apr-22	
3	Rent Concessions	None		None		None		None		None	
4	Occupancy for Unit Type	100%		100%		100%		100%		100%	
5	Effective Rent & Rent/ sq. ft	\$795	0.93	\$700	0.78	\$810	1.11	\$915	1.08	\$775	1.17
B.	Design, Location, Condition	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
6	Structure / Stories	WU/2		TH/2		WU/2		WU/3		WU/2	
7	Yr. Built/Yr. Renovated	2006/2023		2006	\$9	2003	\$12	2001	\$14	2007	\$8
8	Condition/Street Appeal	G		E	(\$15)	G		G		G	
9	Neighborhood	G		G		G		G		G	
10	Same Market?	Yes		Yes		No	(\$81)	No	(\$92)	No	(\$78)
C.	Unit Equipment/ Amenities	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
11	# Bedrooms	1	(\$50)	2	(\$50)	1		1		1	
12	# Baths	1		1.5	(\$15)	1		1		1	
13	Unit Interior Sq. Ft.	750	(\$27)	900	(\$37)	730	\$5	850	(\$25)	665	\$21
14	Patio/Balcony/Sunroom	Y		Y		Y		Y		Y	
15	AC: Central/Wall	C		C		C		C		C	
16	Range/Refrigerator	R/F		R/F		R/F		R/F		R/F	
17	Microwave/Dishwasher	Y/Y	\$5	N/Y	\$5	N/Y	\$5	Y/Y		Y/Y	
18	Washer/Dryer	HU/L	\$10	W/D	(\$25)	HU/L		HU/L		HU	\$5
19	Floor Coverings	C/V		C/V		C/V		W/V		C/V	
20	Window Treatments	Y		Y		Y		Y		Y	
21	Secured Entry	N		N		N		N		N	
22	Garbage Disposal	Y		N	\$5	Y		Y		Y	
23	Ceiling Fan/Storage	Y/Y	\$10	Y/N	\$5	Y/N	\$5	Y/N	\$5	N/Y	\$5
D.	Site Equipment/ Amenities	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
24	Parking (\$ Fee)	LOT/\$0		LOT/\$0		LOT/\$0		LOT/\$0		LOT/\$0	
25	On-Site Management	Y		N	\$5	Y		Y		Y	
26	Security Features	N		N		Y	(\$5)	Y	(\$5)	Y	(\$5)
27	Community Space	Y	\$5	N	\$5	Y		Y		N	\$5
28	Pool/Recreation Areas	N		N		N		P/F/S	(\$18)	N	
29	Computer/Business Center	N		N		N		Y	(\$3)	N	
30	Grilling Area	N		N		N		Y	(\$3)	N	
31	Playground	Y		N	\$3	Y		Y		N	\$3
32	Social Services	N		N		N		N		N	
E.	Utilities	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
33	Heat (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
34	Cooling (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
35	Cooking (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
36	Hot Water (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
37	Other Electric	N		N		N		N		N	
38	Cold Water/Sewer	N/N	(\$72)	N/N		Y/Y	(\$72)	N/N		N/N	
39	Trash/Recycling	Y/N		Y/N		Y/N		Y/N		N/N	\$18
F.	Adjustments Recap	Pos	Neg	Pos	Neg	Pos	Neg	Pos	Neg	Pos	Neg
40	# Adjustments B to D	6	2	7	5	4	2	2	6	6	2
41	Sum Adjustments B to D	\$83	(\$77)	\$37	(\$142)	\$27	(\$86)	\$19	(\$146)	\$47	(\$83)
42	Sum Utility Adjustments		(\$72)				(\$72)			\$18	
		Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross
43	Net/ Gross Adjmts B to E	(\$66)	\$232	(\$105)	\$179	(\$131)	\$185	(\$127)	\$165	(\$18)	\$148
G.	Adjusted & Market Rents	Adj. Rent		Adj. Rent		Adj. Rent		Adj. Rent		Adj. Rent	
44	Adjusted Rent (5+ 43)	\$729		\$595		\$679		\$788		\$757	
45	Adj Rent/Last rent		92%		85%		84%		86%		98%
46	Estimated Market Rent	\$720		\$0.96		← Estimated Market Rent/ Sq. Ft					

Rent Comparability Grid

Unit Type →

TWO-BEDROOM

Subject		Comp #1		Comp #2		Comp #3		Comp #4		Comp #5	
Palmetto Pointe Apartments		Indian Land Apts.		Magnolia Manor		Cardinal Glen		Regency Park		Winter Ridge	
1123 Palmetto Pointe Drive		1728 Indian Land Dr.		117 Caldwell St.		1524 Parkway Rd.		120 Edinborough Cir.		102 Winter Way	
Newberry, SC		Newberry, SC		Newberry, SC		Greenwood, SC		Greenwood, SC		Greenwood, SC	
A.	Rents Charged	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
1	\$ Last Rent / Restricted?	\$795		\$700		\$905		\$1,000		\$885	
2	Date Surveyed	Apr-22		Apr-22		Apr-22		Apr-22		Apr-22	
3	Rent Concessions	None		None		None		None		None	
4	Occupancy for Unit Type	100%		100%		100%		100%		100%	
5	Effective Rent & Rent/ sq. ft	\$795	0.93	\$700	0.78	\$905	0.97	\$1,000	1.00	\$885	0.90
B.	Design, Location, Condition	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
6	Structure / Stories	WU/2		TH/2		WU/2		WU/3		WU/2	
7	Yr. Built/Yr. Renovated	2006/2023		1977	\$38	2006	\$9	2003	\$12	2001	\$14
8	Condition/Street Appeal	G		F	\$15	E	(\$15)	G		G	
9	Neighborhood	G		G		G		G		G	
10	Same Market?	Yes		Yes		No	(\$91)	No	(\$100)	No	(\$89)
C.	Unit Equipment/ Amenities	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
11	# Bedrooms	2		2		2		2		2	
12	# Baths	2		1	\$30	1.5	\$15	2		2	
13	Unit Interior Sq. Ft.	947		859	\$20	900	\$11	935	\$3	1000	(\$12)
14	Patio/Balcony/Sunroom	Y		Y		Y		Y		Y	
15	AC: Central/Wall	C		C		C		C		C	
16	Range/Refrigerator	R/F		R/F		R/F		R/F		R/F	
17	Microwave/Dishwasher	Y/Y		N/Y	\$5	N/Y	\$5	N/Y	\$5	Y/Y	
18	Washer/Dryer	HU/L		L	\$10	W/D	(\$25)	HU/L		HU/L	\$5
19	Floor Coverings	C/V		C/V		C/V		W/V		C/V	
20	Window Treatments	Y		Y		Y		Y		Y	
21	Secured Entry	N		N		N		N		N	
22	Garbage Disposal	Y		Y		N	\$5	Y		Y	
23	Ceiling Fan/Storage	Y/Y		N/N	\$10	Y/N	\$5	Y/N	\$5	Y/N	\$5
D.	Site Equipment/ Amenities	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
24	Parking (\$ Fee)	LOT/\$0		LOT/\$0		LOT/\$0		LOT/\$0		LOT/\$0	
25	On-Site Management	Y		Y		N	\$5	Y		Y	
26	Security Features	N		N		N		Y	(\$5)	Y	(\$5)
27	Community Space	Y		N	\$5	N	\$5	Y		Y	\$5
28	Pool/Recreation Areas	N		N		N		N		P/F/S	(\$18)
29	Computer/Business Center	N		N		N		N		Y	(\$3)
30	Grilling Area	N		N		N		N		Y	(\$3)
31	Playground	Y		Y		N	\$3	Y		Y	\$3
32	Social Services	N		N		N		N		N	
E.	Utilities	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
33	Heat (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
34	Cooling (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
35	Cooking (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
36	Hot Water (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
37	Other Electric	N		N		N		N		N	
38	Cold Water/Sewer	N/N		Y/Y	(\$77)	N/N		Y/Y	(\$77)	N/N	
39	Trash/Recycling	Y/N		Y/N		Y/N		Y/N		Y/N	\$18
F.	Adjustments Recap	Pos	Neg	Pos	Neg	Pos	Neg	Pos	Neg	Pos	Neg
40	# Adjustments B to D	8		9	2	5	2	2	6	5	3
41	Sum Adjustments B to D	\$133		\$63	(\$40)	\$55	(\$96)	\$19	(\$141)	\$26	(\$103)
42	Sum Utility Adjustments		(\$77)				(\$77)			\$18	
		Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross
43	Net/ Gross Adjmts B to E	\$56	\$210	\$23	\$103	(\$118)	\$228	(\$122)	\$160	(\$59)	\$147
G.	Adjusted & Market Rents	Adj. Rent		Adj. Rent		Adj. Rent		Adj. Rent		Adj. Rent	
44	Adjusted Rent (5+ 43)	\$851		\$723		\$787		\$878		\$826	
45	Adj Rent/Last rent		107%		103%		87%		88%		93%
46	Estimated Market Rent	\$820		\$0.87		← Estimated Market Rent/ Sq. Ft					

Rent Comparability Grid

Unit Type → **THREE-BEDROOM**

Subject		Comp #1		Comp #2		Comp #3		Comp #4		Comp #5	
Palmetto Pointe Apartments		Indian Land Apts.		Magnolia Manor		Cardinal Glen		Regency Park		Winter Ridge	
1123 Palmetto Pointe Drive		1728 Indian Land Dr.		117 Caldwell St.		1524 Parkway Rd.		120 Edinborough Cir.		102 Winter Way	
Newberry, SC		Newberry, SC		Newberry, SC		Greenwood, SC		Greenwood, SC		Greenwood, SC	
Data		Data		Data		Data		Data		Data	
on		\$ Adj		\$ Adj		\$ Adj		\$ Adj		\$ Adj	
Subject		Data		Data		Data		Data		Data	
A.	Rents Charged	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
1	\$ Last Rent / Restricted?	\$895		\$700		\$1,090		\$1,150		\$1,300	
2	Date Surveyed	Apr-22		Apr-22		Apr-22		Apr-22		Apr-22	
3	Rent Concessions	None		None		None		None		None	
4	Occupancy for Unit Type	100%		100%		100%		100%		100%	
5	Effective Rent & Rent/ sq. ft	\$895	0.91	\$700	0.78	\$1,090	0.95	\$1,150	1.00	\$1,300	1.10
B.	Design, Location, Condition	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
6	Structure / Stories	WU/2		TH/2		WU/2		WU/3		WU/2	
7	Yr. Built/Yr. Renovated	2006/2023		1977	\$38	2006	\$9	2003	\$12	2001	\$8
8	Condition/Street Appeal	G		F	\$15	E	(\$15)	G		G	
9	Neighborhood	G		G		G		G		G	
10	Same Market?			Yes		Yes		No	(\$109)	No	(\$115)
C.	Unit Equipment/ Amenities	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
11	# Bedrooms	3		3		2	\$50	3		3	
12	# Baths	2		1.5	\$15	1.5	\$15	2		2	
13	Unit Interior Sq. Ft.	1179		980	\$48	900	\$67	1150	\$7	1150	\$7
14	Patio/Balcony/Sunroom	Y		Y		Y		Y		Y	
15	AC: Central/Wall	C		C		C		C		C	
16	Range/Refrigerator	R/F		R/F		R/F		R/F		R/F	
17	Microwave/Dishwasher	Y/Y		N/Y	\$5	N/Y	\$5	N/Y	\$5	Y/Y	
18	Washer/Dryer	HU/L		L	\$10	W/D	(\$25)	HU/L		HU/L	\$5
19	Floor Coverings	C/V		C/V		C/V		C/V		W/V	
20	Window Treatments	Y		Y		Y		Y		Y	
21	Secured Entry	N		N		N		N		N	
22	Garbage Disposal	Y		Y		N	\$5	Y		Y	
23	Ceiling Fan/Storage	Y/Y		N/N	\$10	Y/N	\$5	Y/N	\$5	Y/N	\$5
D.	Site Equipment/ Amenities	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
24	Parking (\$ Fee)	LOT/\$0		LOT/\$0		LOT/\$0		LOT/\$0		LOT/\$0	
25	On-Site Management	Y		Y		N	\$5	Y		Y	
26	Security Features	N		N		N		Y	(\$5)	Y	(\$5)
27	Community Space	Y		N	\$5	N	\$5	Y		Y	\$5
28	Pool/Recreation Areas	N		N		N		N		P/F/S	(\$18)
29	Computer/Business Center	N		N		N		N		Y	(\$3)
30	Grilling Area	N		N		N		N		Y	(\$3)
31	Playground	Y		Y		N	\$3	Y		Y	
32	Social Services	N		N		N		N		N	
E.	Utilities	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
33	Heat (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
34	Cooling (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
35	Cooking (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
36	Hot Water (in rent?/ type)	N/E		N/E		N/E		N/E		N/E	
37	Other Electric	N		N		N		N		N	
38	Cold Water/Sewer	N/N		Y/Y	(\$85)	N/N		Y/Y	(\$85)	N/N	
39	Trash/Recycling	Y/N		Y/N		Y/N		Y/N		Y/N	\$18
F.	Adjustments Recap	Pos	Neg	Pos	Neg	Pos	Neg	Pos	Neg	Pos	Neg
40	# Adjustments B to D	8		10	2	4	2	3	5	5	2
41	Sum Adjustments B to D	\$146		\$169	(\$40)	\$29	(\$114)	\$26	(\$144)	\$26	(\$135)
42	Sum Utility Adjustments		(\$85)				(\$85)			\$18	
		Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross
43	Net/ Gross Adjmts B to E	\$61	\$231	\$129	\$209	(\$170)	\$228	(\$118)	\$170	(\$91)	\$179
G.	Adjusted & Market Rents	Adj. Rent		Adj. Rent		Adj. Rent		Adj. Rent		Adj. Rent	
44	Adjusted Rent (5+ 43)	\$956		\$829		\$920		\$1,032		\$1,209	
45	Adj Rent/Last rent		107%		118%		84%		90%		93%
46	Estimated Market Rent	\$975		\$0.83		← Estimated Market Rent/ Sq. Ft					

Once all adjustments to collected rents were made, the adjusted rents for each comparable were used to derive an achievable market rent for each bedroom type. Each property was considered and weighed based upon its proximity to the subject site and its amenities and unit layout compared to the subject site.

Based on the preceding Rent Comparability Grids, it was determined that the present-day achievable market rents for units similar to the subject development are \$720 for a one-, \$820 for a two- and \$975 for a three-bedroom unit, which are illustrated as follows:

Bedroom Type	Proposed Collected Rent (AMHI)	Achievable Market Rent	Market Rent Advantage
One-Br.	\$390 (50%)	\$720	45.83%
	\$465 (60%)		35.42%
Two-Br.	\$430 (50%)	\$820	47.56%
	\$550 (60%)		32.93%
Three-Br.	\$500 (50%)	\$975	48.72%
	\$625 (60%)		35.90%
Weighted Average			37.53%

Typically, Tax Credit rents should represent market rent advantages around 10.0% in order to be considered a value in most markets. Therefore, the proposed subject rents will likely be perceived as substantial values within the Newberry Site PMA, as they represent market rent advantages ranging from 32.93% to 48.72%, depending upon bedroom type and targeted income level.

B. RENT ADJUSTMENT EXPLANATIONS (RENT COMPARABILITY GRID)

None of the selected properties offer the same amenities as the subject property. As a result, we have made adjustments to the collected rents to reflect the differences between the subject property and the selected properties. The following are explanations (preceded by the line reference number on the comparability grid table) for each rent adjustment made to each selected property.

1. Rents for each property are reported as collected rents. These are the actual rents paid by tenants and do not consider utilities paid by tenants. The rents reported are typical and do not consider rent concessions or special promotions.

7. Upon completion of renovations, the subject project will have an effective age of a project built in 2015. The selected properties were built between 1977 and 2007. As such, we have adjusted the rents at the selected properties by \$1 per year of effective age difference to reflect the age of these properties.

8. It is anticipated that the subject project will have an improved appearance, once renovations are complete. We have made adjustments for those properties that we consider to be of either inferior or superior quality compared to the subject development.
10. Three of the selected market-rate properties are located outside of the Newberry Site PMA in Greenwood. The Greenwood market is much larger than Newberry in terms of population, community services, employment opportunities and apartment selections. Given the differences in markets, the rents that are achievable in Greenwood will not directly translate to the Newberry market. Therefore, we have adjusted each collected rent at these three comparable projects by approximately 10.0% to account for this market difference.
11. We have made adjustments for the differences in the number of bedrooms offered at the selected market-rate projects due to the fact that not all of the selected properties offer one- and/or three-bedroom units. A conservative adjustment of \$50 per bedroom was used to reflect this difference.
12. There is a variety of the number of bathrooms offered at each of the selected properties. We have made adjustments of \$15 per half bathroom to reflect the difference in the number of bathrooms offered at the site as compared with the comparable properties.
13. The adjustment for differences in square footage is based upon the average rent per square foot among the comparable properties. Since consumers do not value extra square footage on a dollar-for-dollar basis, we have used 25% of the average for this adjustment.
- 14.-23. The subject project will offer a unit amenity package superior to those offered at the selected properties. We have made adjustments for features lacking at the selected properties.
- 24.-32. The subject project offers a comprehensive project amenities package. We have made monetary adjustments to reflect the difference between the subject project's and the selected properties' project amenities.
- 33.-39. We have made adjustments to reflect the differences in utility responsibility at each selected property. The utility adjustments were based on the local housing authority's utility cost estimates.