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**To:** [TaxCreditQuestions](#)  
**Cc:** [Tanya Eastwood](#); [Amie Cofini](#); [Will Eckstein](#)  
**Subject:** [External] SC Housing 2022 Draft QAP Comments  
**Date:** Friday, October 15, 2021 11:45:30 AM

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On behalf of Greystone Affordable Development, we would like to thank the South Carolina State Housing Finance and Development Authority's commitment to affordable housing and the people of South Carolina. We also appreciate the opportunity to provide comments for the 2022 draft QAP.

## **SCSHFDA 2022 QAP (Draft)**

**Section V.I.1.** – It would be helpful to understand what would trigger the Authority's hiring of another appraiser at the applicant's expense.

### **Section V.J** - City/County/Legislative Notification

To ensure that all specific requirements are met within the notification, it would be helpful for the agency to provide a template.

### **Section V.S.11.c**

It is unusual to see cash flow loans and related party loans considered additional deferred fee and included in the maximum percentage. This would have an adverse impact on the required leveraging to balance sources and uses. It would be more advantageous for projects to decrease the percentage of deferred fee and allow soft debt to be included in the sources outside of that percentage cap. If this requirement must stay, it is helpful that the limit be raised to 50%.

## **Appendix B – Design Criteria**

**Section I.C.15** – Does this certification for lead-free pipes, solder and flux apply to rehab projects?

### **Section III.B.1** – Unit Size and Base Requirements

The minimum square footage for a one bedroom should be 700 square feet. This is aligned with the market and encourages a more efficient building footprint.

**Section III.B.3** -Primary Bedrooms should be allowed to be 168 square feet. 168 square feet is a "typical" 12 foot x 14 foot room size, this is in alignment with market.

**Section III.B.5** – Is the fiberglass tub/shower a minimum or a requirement?

**Section III.B.6** – Balcony, sunroom, or patio

- a. Do Patios require railing?

**Section III.L.1** – Primary bedroom should be 168 square feet. 168 square feet is a “typical” 12 foot x 14 foot room size, this is in alignment with market.

**Section III.P.2** – multi-story properties should not require sub metering.

Thank you.

**Sarah Jones-Anderson | Director of Development**

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