

2023 Annual Action Plan HOME & NHTF Public Comments & Responses

2/21/2023

Comment: Page 9: Item 19: “Sites with exterior noise levels of 65 decibels or higher are not eligible for funding.” Page 19 item 7: “Sites with exterior noise levels of 65 decibels or higher are not eligible for funding.” Appendix B: Page 18: “Sites with exterior noise levels of 65 decibels or higher are not eligible for funding.” Commentary: Given the need for affordable housing near job centers and transit lines, noise levels for highly desirable project locations will likely exceed 65 decibels. We ask that this be changed to 75 decibels with the requirement that developers mitigate the exterior and/or interior noise levels for the project when required. A sound consultant could be required by SC Housing when projects exceed 65 decibels to ensure a successful design and built project that meets the sound levels required by HUD.

Response: In order to provide more options for site selection SC Housing is revising the requirements to state that sites with exterior noise levels of 75 decibels or higher are not eligible for funding. Sites with noise levels of 65 – 74.99 decibels will need to be mitigated.

Comment: Page 22: Item 4a & 4b: Commentary: With the inflation of costs in 2021-2022, nearly all projects have been over budget which delayed the projects while gap funding was identified. We ask that the project completion dates for the SRDP 2019 awards be July 31, 2023 instead of March 1, 2023. We also ask that 75% completion be obtained for SRDP 2020 projects by July 31, 2023, instead of March 1, 2023. Similarly, we ask that the requirement of no more than two open awards be modified to the July 31, 2023, date instead of March 1, 2023 or offer waivers for developers with reasonable expectation for previous award completion be allowed to apply for next project even though they still have two nearly complete projects in process.

Response: SC Housing has concerns that allowing applicants to have more than two open awards at one time will prevent applicants from completing projects timely; and therefore, the completion benchmarks for open awards and the limitation that each principal have no more than two open awards at one time will remain unchanged.

Comment: Page 26: Affordable Housing Shortage, Item 1.: Commentary: Unfortunately, the need for affordable housing in communities is not always solved by having a previous SRDP award in the past five years. We ask that this criterion be changed back to the scoring criteria in the SRDP 2022 manual where the local housing shortage was based on need and demand based on the County. Page 26: Affordable Housing Shortage, Item 2.: Commentary: We understand the need to disperse the awards across job centers across South Carolina however given the range of difficulty that exists when developing in different counties and cities, we ask that this criterion be changed to from the past three years to the past one year. For example, Charleston County is approximately 71 miles wide from east to west. A

project awarded in the eastern area of Charleston County in SRDP 2020 funding round will have little to no impact on the affordability of a community in the western area of Charleston County.

Response: Scoring was revised in the 2023 SRDP application to incentivize the geographic distribution of funds to areas of the state that have not been awarded in recent years.

Comment: Appendix B: Page 13 Commentary: We understand the need to provide sufficient parking for developments. We believe that the local municipalities parking ordinance should supersede the parking requirements found in Appendix B if they exist. If a project is in a municipality or county that does not have parking requirements, then the parking requirements in Appendix B should be followed.

Response: The existing language in Appendix B states that “if local guidelines mandate parking less than the Authority requirement, the development must receive Authority approval prior to application submittal. If local guidelines mandate more parking than the Authority, the development must follow those mandates.”

Comment: Appendix B: Page 28 Item S.1.a. Townhouses require a minimum of two (2) bedrooms
Commentary: We believe one-bedroom units should be allowed for townhome developments when there are also two- or three-bedroom units in the same development. There is a need for one-bedroom units, and this will potentially allow sites to maximize unit counts with 2 story units that contain 1 bedroom.

Response: SC Housing will revise the language in Appendix B to state that one-bedroom townhomes are allowable if there are also two- or three-bedroom units in the development.

Comment: Under no circumstances may an awardee and their principals have more than two open SRDP projects at any time. In order to be eligible to participate in the 2023 SRDP application cycle, previous HOME and NHTF awardees and their principals must have met the below deadlines. An SRDP Application Exhibit 7 – Previous Participation Certification, must be submitted with the Intent to Apply Packet. a. All 2019 and prior projects must be officially closed out (see “project completion” definition) on or before March 1, 2023. b. All 2020 projects must have 75% construction completed on or before March 1, 2023, as evidenced by a completed SC Housing inspection. c. 2021 projects must have started vertical construction as of March 1, 2023, as evidenced by a completed SC Housing inspection.

Response: SC Housing has concerns that allowing applicants to have more than two open awards at one time will prevent applicants from completing projects timely; and therefore, the completion benchmarks for open awards and the limitation that each principal have no more than two open awards at one time will remain unchanged.