

**2021 Tax Credit Program**  
**Bulletin #6**  
**March 30, 2021**

**Questions and Answers**

1. **Question:** If a development has a nearby railroad the QAP requires a map showing the distance. What Tab does the map go under?  
**Answer:** Tab 12
  
2. **Question:** If a development is adaptive reuse how should the developer represent the building costs and the land costs in the application since the Authority commissions a land appraisal?  
**Answer:** The developer should input the value they determined for the land; once the appraisal has been received SC Housing's underwriter will update the land value in the application.
  
3. **Question:** Appendix E, Page E-8, Items C.2. and C.3. both state that waivers are to be completed by January 31, 2021; however, Exhibit X states we can obtain a waiver by April 15, 2021. Please clarify that we have until April 15, 2021 to request a waiver.  
**Answer:** A waiver can be requested until April 15, 2021.
  
4. **Question:** If a developer received an Authority waiver last year and nothing has changed from 2020 to 2021, the waiver request for 2021 will be exactly the same; can the developer rely on the initial waiver the Authority provided?  
**Answer:** Yes, please provide a copy of the waiver from 2020 in the new application.
  
5. **Question:** Please confirm the number of federal LIHTCs that have been allocated for 2021?  
**Answer:** We anticipate the state has \$18.3 million in LIHTCs (the 2021 per-capita amount and unused from 2020), plus \$2.78 million in disaster LIHTCs.
  
6. **Question:** If planning to build garden style units as well as some townhouse units within the same development which utility allowance would be used, the larger apartment buildings 5+ units allowance or would we need to use two utility allowances, the larger apartment buildings 5+ units and the low rise units 2-4 if the townhouses are in rows of four attached units?  
**Answer:** You would need to use multiple utility allowances for the different unit types.
  
7. **Question:** Please confirm that a Physical Needs Assessment Report dated within 12 months of the tax credit application submission date will be acceptable for the purposes of 2021 QAP Section V(A)(4) even if the physical inspection was conducted more than 12 months prior to the submission date.  
**Answer:** Yes, as long as the report is dated within 12 months of the application submission date.
  
8. **Question:** 2020 Tax Credit Bulletin #3 stated that "No Wetlands Certification is required for rehabilitation developments." Please confirm that this same policy will be applied to rehabilitation applications submitted under the 2021 QAP.  
**Answer:** The Wetlands Certification is not required for Rehab applications, as long as the application does not require any new structures to be added.

9. **Question:** Our application is a resubmission of a project which was not funded in the 2020 tax credit funding round. As part of that application, notification letters were provided to the appropriate city, county, and legislative officials. Will the applicant be required to send new notification letters to those same city, county, and legislative officials under 2021 QAP Section V(J) for our intended 2021 submission if the project is essentially unchanged?  
**Answer:** Yes.
10. **Question:** If the roof of the adaptive reuse building is removed and an additional floor added to the building will the additional square footage created in the adaptive reuse building count towards the 50% total square footage of the adaptive reuse building?  
**Answer:** Yes, if the created square footage is usable.
11. **Question:** If there is no rehab involved, is testing for asbestos containing materials required?  
**Answer:** The development must meet code standards for testing of asbestos containing materials.
12. **Question:** If rehab is involved but the scope of work is not yet defined, is applicant able to submit their application with a recommendation to perform asbestos testing at a later date?  
**Answer:** The scope of work is required at final application.
13. **Question:** If the project is an acquisition with buildings constructed prior to 1978, do they need to test for lead based paint before the application submission or are they able to presume lead based paint and manage under an O&M (and maybe test later once they own it if they are required to do so)?  
**Answer:** The scope of work is required at final application.
14. **Question:** If the site is not in an EPA Zone 1, are there any radon requirements for testing for sub rehab or radon-resistant construction and testing for new construction in zones 2 or 3?  
**Answer:** Sites located in a Radon Zone-1 (highest level) will require Radon Resistant New Construction Practices. Rehabilitation projects must meet the Radon Mitigation Standards as required by the Environmental Protection Agency. Check applicable federal, state, and local building codes to see if more stringent codes apply.
15. **Question:** Is a HUD Noise Study Only required for projects with HOME Funds?  
**Answer:** A noise study may be required at the discretion of SC Housing.
16. **Question:** For a rehab project, where we have an existing community, can we use current water bills to demonstrate water and sewer availability?  
**Answer:** Yes.