



June 9, 2021

Gary Long
GDA Development Partners, LLC

Re: List of proposed changes to items in 2022 QAP

Dear Mr. Long,

Please find below a list of items that we would like for you to consider as proposed changes for the upcoming 2022 SC State Housing Multifamily Tax-Exempt Bond deals. This list of items is taken from the 2021 QAP that we feel may be above and beyond what we are seeing in market-rate, luxury apartment developments.

1. Breezeways: 48" minimum path of travel is required through building breezeways.
 - a. With a standard 8'-0" wide breezeway, the 48" minimum width requirement requires the stair widths to be reduced down to minimum clearances and construction tolerances are reduced to where this requirement is very difficult to have installed correctly. The solution is to widen the breezeway to 8'-6" or more and this creates more building and cost to the project. It is preferred to have an efficient breezeway width while also creating a stair width that will allow for furniture to be moved easily. Therefore, it is asked that this minimum path be reduced at the stair portions to 42" minimum.
2. Community multi-purpose room must contain 8 square feet for each unit.
 - a. This requirement is disproportionate, requiring the Leasing/Community Buildings to become excessively large. For a 288-unit development, a multi-purpose room of over 2,300 square feet must be provided. For these type deals, the Leasing/Community Buildings are not capable of supporting this much additional square footage. Would 5 square feet for each unit be considered for larger developments?
3. On exterior walls the brick/stone must extend to all areas of grass, landscaping and other areas of soil or mulch.
 - a. It has been my experience that the manufactures of the cultured stone projects do not recommend extending the cultured stone to the grade and do not warranty it. Please consider allowing the cultured stone veneer to stop at the finished floor height, i.e. the top of the slab.
4. All units and community buildings must be elevated 24" minimum above the base flood elevation for the 100, 500 and 1,000 year flood elevations.
 - a. While the purpose of this requirement is understood, the 24" requirement seems excessive and has potential for cost increases to the project to satisfy the 2'-0" above BFE requirement. Often, the local jurisdiction or municipality also requires slab elevations to be above the BFE by some measurement. Can the requirement be reduced or stated that it must meet the local jurisdictional requirements? Additional consideration to the 500 and 1,000 year flood elevation requirement?
5. At roofs with asphalt shingles and metal roofs, synthetic underlayment is required and must be of the same brand as the roofing.
 - a. A typical underlayment for residential apartment buildings is roof felt, 15# at the shingles and 60# at the metal roofs. The synthetic underlayment adds additional cost to the project that seems unwarranted. Can the requirement include roof felt options in lieu of just one underlayment type?
6. Low slope roofing requires metal panels with 3" seam height since metal roofing is required to be a minimum of 4:12.
 - a. A 3" seam height is not a standard metal roofing panel seam height and makes the product more expensive to acquire and more difficult to find in the residential subcontractor market. A more standard seam height for metal roof panels is 1-1/2". Should the minimum metal roof slope be changed to 2:12, minimum, if warranty requirements are met, and then anything lower than 2:12 falls under the "low slope" category and the 3" seam height can be kept?
7. All low slope roof products to be installed with heavy duty walkway pads.
 - a. It is not standard practice to install walk pads on metal roofs down to 2:12 slopes. Please consider only requiring walkway pads at slopes less than 1:12?

8. Gutter and downspout systems complete with leaf guard systems...no screen wire leaf guard systems allowed.
 - a. Leaf guard systems are atypical for apartment projects, even market rate, luxury apartment projects. It adds unnecessary cost to the projects.
9. All interior bedroom doors must be 3'-0".
 - a. This requirement makes sense for the ground level units of a 3-story, garden style, apartment building but does not seem reasonable for the upper floor, non-accessible, units. Can the door requirement be limited to the ground level of garden style walk-up deals?
10. The use of duct board is prohibited.
 - a. Duct board is a typical trunkline material for these residential apartment units. To not allow the material increases the cost of the installation and is beyond that which is installed in market-rate, luxury apartments. Can the requirement be removed from the section?
11. Toilets to be ADA height in all units.
 - a. This requirement is very much like the bedroom doors. It makes sense to provide ADA height toilets on the ground level of 3-story, garden-style, walk-ups since the units found on the ground floor are Type A and Type B Accessible units. On the upper floor units, an ADA height toilet could be found cumbersome to a family occupying the unit as these toilets are not conducive to children's use. Can the language be clarified to only be ADA height at ground level conditions?
12. All call for aid devices must be installed beside or below ceiling light switches in bedrooms and bathrooms.
 - a. This requirement should clarify that this is for ADA (Type-A accessible) units only.
13. Will the global basis boost in SC be continued next year?

Sincerely,



Patrick D. Iannelli, AIA
President (PDI Architecture, LLC)

cc. ...