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October 15, 2021

South Carolina State Housing Finance and Development Authority
Attn: Kim Wilbourne, LIHTC Manager
300-C Outlet Pointe Blvd.
Columbia, SC 29210

RE: DRAFT SC 2022 QAP Comments

Dear Ms. Wilbourne,

Thank you for the opportunity to comment on the draft SC 2022 QAP and your continued support in creating affordable housing opportunities for the citizens of South Carolina.

1. Developers should not be penalized for participating in a qualified contract on developments funded prior to 2020. The QAP serves as a book of guidance for a project not only at application but throughout the duration of the compliance period of the LIHTC program. For example, in consideration of selling a LIHTC property, the QAP which correlates with the year an application is submitted and awarded governs the terms to be followed. If all other terms governing a development result back to the QAP the year the project was awarded, why shouldn't that year govern the option for qualified contract also? Allowing for qualified contract enables developers to refinance and rehabilitate a property. It eases income restrictions to target the "forgotten middle" which can continue to serve as a form of affordable housing.

2. Unify the application process with the QAP. In completing the application process this year it was often unclear if an item was indeed required or applicable due to discrepancies between the documents. Especially understanding what was or was not required for 4% tax-exempt bond financing versus 9% LIHTC. This resulted in contacting SC Housing on multiple occasions to receive final clarity. Aligning the application process with the QAP will be more time efficient for both SC Housing and the developer.

3. Create a set-aside for urban populations with comparatively higher per square foot constructions costs and those who respond to Boards of Architectural Review and/or Design Review Boards.

Respectively,

A handwritten signature in blue ink, appearing to read 'Tracy T. Doran'.

Tracy T. Doran,
The Humanities Foundation, Inc.
President

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