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August 26, 2022

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

RE: Comments on 2023 Draft Qualified Allocation Plan

Dear Ms. Wilbourne:

Please see the below Comments on the 2023 Draft QAP.

- A non-profit set aside with a dollar amount available within that set aside should be part of the QAP as it was in the past. Also, eliminating the three full-time staff requirements would allow more SC Housing Authorities to utilize the program as they often have non-profit affiliates that do not have full-time staff. Both Georgia and North Carolina have a non-profit set aside and no full-time staff requirements which is not required by code.
- Keep the required Development Experience at two LIHTC projects in SC or 4 projects from other states. Doubling the requirement is arbitrary and having had issues with developers in the past seems lacking as an explanation. Secondly, the concept of having junior developers is/was an opportunity to expand participation. With its elimination and now proposing to expand the experience threshold seems to contradict the idea of increasing participation, and is even further limiting.
- Develop criteria that levels the experience playing field and gives recognition of experience that SC Public Housing Authorities and/or their affiliates have in multifamily housing, SC Housing should be expanding its participation and partnerships with public housing authorities and not have arbitrary barriers for participation.

Considering these comments and revising the QAP to reflect the same will allow SC Housing Authorities to participate more fully in the program for the betterment of all South Carolinians. Thank you for the opportunity to comment. If you have any questions, please contact me at (803) 324-6350 or via electronic mail at dalford@rhha.org.

Sincerely,

Dewayne Alford
Executive Director